

THIRD NATIONAL CONFERENCE ON
RADIO READING SERVICES FOR
BLIND AND PHYSICALLY HANDICAPPED PERSONS

MARCH, 1977

BETHESDA, MD.

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AMERICAN FOUNDATION FOR THE BLIND, INC.
15 WEST 16th STREET
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PROCEEDINGS OF THE THIRD NATIONAL CONFERENCE ON
RADIO READING SERVICES FOR
BLIND AND PHYSICALLY HANDICAPPED PERSONS
MARCH 14-17, 1977
BETHESDA, MARYLAND

American Foundation for the Blind, Inc.
15 West 16th Street
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NEW DIMENSIONS IN RADIO READING SERVICES:
AN UPDATE ON THE STATE OF THE ART

Jim Jones, Executive Director
IN TOUCH NETWORKS, INC.
New York, New York

IN TOUCH is New York's only radio information service for the blind and physically handicapped. We started in May 1974, broadcasting an average of four hours a week. We recently signed a contract with WKCR-FM, Columbia University's radio station, to begin sub-carrier broadcasting in New York City.

We think we're particularly unique because New York has the largest population of visually handicapped individuals. In fact, there are 26,000 registered with the State Commission for the Visually Handicapped and the estimate is that there are an equivalent number of blind people who are unknown to the Commission. You add to that a population of a minimum of 50,000 individuals with other physical handicaps and we have a very, very large population to serve.

I'd like to go back a little bit and tell you how we started the service in New York and how we got to the point where we are today. I lost my sight in 1968. Sometime in 1972 I received a letter from a blind friend of mine living in Wisconsin, along with a clipping from a Wisconsin newspaper about the Radio Talking Book in Minnesota. Well, I became so excited about this concept of getting information to blind people that the next thing I did was approach some of the agencies serving blind people in New York City. For one reason or another the agencies had no interest in starting a similar service. So, a group of us decided to form our own organization to get a radio program for the handicapped started in New York. We thought we could do it with very, very little money, even though we would only be starting with a few hours a week. The idea was that service, even if it was half-an-hour a week or an hour a week, was the key thing. Let's get something out to people who can't read print.

We approached a friend of mine, Milt Hoffman, who was producer at Channel 13, the public broadcasting station in New York City. He was also producing, at that time, a documentary series on radio station WBAI, it was called "Not Without Art." He was encouraging blind people in New

York to produce programs for the series on any topic they were interested in. His ideas included a special series on art works, sports, etc. He offered a half-hour slot to us. We put together the ingredients for a half-hour program. WBAI gave us the use of their taping facility. We had nothing at the time, since all of us involved with IN TOUCH had full time jobs elsewhere. WBAI allowed us to place a long distance phone call to Stanley Potter in Minnesota. I spoke with Stan for about 20 minutes about the Radio Talking Book in Minnesota and the need for such radio reading services for the blind.

A second part of the program was a panel discussion among Bill Gallagher, Else Kramer, who was coordinator of Library Services at the New York Association for the Blind, Dick Snipas, a computer programmer at International Paper and me. We all sat around in one of the recording studios and discussed the reasons we thought a radio reading service would be good for the community. The other elements for the program were selections of the types of articles we would be airing on the broadcasts. We selected some editorial columns and features and were very fortunate in getting Ellen Stern, who is the writer of the "Best Bets" column of New York Magazine, to read her own column. So we had the three segments for the half-hour program which we now run into probably two hours of pre-recorded material. We had to edit it down to a half-hour program. We did this and had the first program of its kind, I believe, aired in New York on WBAI in August 1973.

We then took that taped broadcast and dubbed off several cassettes from it and mailed one copy to Barry Farber, a local radio personality on Station WOR. He was excited about the idea mainly because several years earlier he had thought of starting a sub-carrier broadcast for the blind but his other interests diverted him from the project. Well, because of his personal interest, he gave us 45 minutes on his program. All we had at that time was a post office box and we were appealing for funds, space and generally getting the word out to the community on how important the radio reading service would be. We got some very good responses from this appeal. I should tell you about an interesting experience I had during the program. After I had been talking some ten minutes, someone in the studio told me later, Barry Farber put his hand up to stop me so that he could do a commercial. Naturally, I didn't see the hand and kept right on with about 20 minutes of monologue right from the beginning of the program. He said later that he didn't interrupt me because he felt what I had to say was worth while enough to drop a few commercials.

Let me tell you a little about some of the people involved with us from the beginning. We had about six volunteers who pulled articles out of newspapers and magazines that they read or subscribed to. My wife, Adele, went over them with one of our volunteers and selected the material for upcoming programs. Jasha Levi from Recording for the Blind was our technical consultant. We were also getting free legal assistance in establishing ourselves as a non-profit, tax-exempt corporation. The attorneys looked at our prospective list of board members and suggested that we would need some names with clout on our board to help get our tax-exemption. We approached Gov. Nelson Rockefeller and were turned down, but Congresswoman Bella Abzug and Borough President of Manhattan Percy Sutton accepted. We had a board made up of five handicapped members and four non-handicapped.

We were incorporated in February 1974 as a not-for-profit corporation and subsequently got our tax-exemption a few months later retroactive to that date. During this time we were approaching some of the local non-commercial stations with the cassette tape we had made at WBAI.

The tape gave them an idea of the types of things we would do on a regular show if they could clear program time on their schedule for us. After listening to the tape and my pitch, WNYE, New York City's Board of Education Station and WFUV, Fordham University's station agreed to clear time for IN TOUCH. Since all we still had was a post office box, we had to arrange for a place to record the material for the show. We wanted to use professional actors for this purpose because it's very difficult to make an editorial or a column interesting by reading it straight. The Jewish Braille Institute, Western Electric and Recording for the Blind were three of the places we used to pre-record. We arranged for actors and material to be at these places, hopefully, at the same time, and used tape that we had donated to us from a variety of sources. I and several other blind people took the tapes home and edited them for each show. We would then deliver the tapes to the stations either before or after our regular jobs.

Now I've got to say that it's very important in starting a service like this one, to get to people who are in the media to publicize to blind people who, in turn, will spread the word. In addition to Barry Farber, we got quite a bit of time from Al Sperber who runs the "Out of Sight" program on WHN here in New York. I'm certain many of you know Al because you probably carry his program on your stations. Well Al, gave us three or four programs to talk about the need for the service

and little by little people began to tune us in. This was May 1974. We also decided that we couldn't be the last word in determining program content, even though some of us were visually handicapped. We conducted a survey of 3,500 handicapped people and received 1,000 responses indicating the types of programming content our listeners would be interested in. It also gave us some idea of the age, and types of employment of those that were responding. We oriented our programs around our listener's preferences and aired them on WYNE and WFUV.

The summer of 1974 came and we got lucky. We met John Tishman, head of Tishman Realty in New York and he offered us 1,200 square feet of store front space on 46th Street between Fifth and Sixth Avenues, rent free. This is prime real estate space which was rentable at about \$2,000 a month. Times were bad in the realty business and the space had been unoccupied for five years, so we jumped at this chance and took the space. It was a mess. It was a very long store front, about 100 feet long and 15 feet wide. Paint was peeling from ceilings and walls. The floor had been torn up and the plumbing didn't work. We thought it was beautiful. I scrounged for people to fix it up. Friends I was working with in Wall Street, actors who were reading for us, wives, husbands anyone we could get, we roped in. People would come up at night after work to paint or plaster or come by on weekends to panel. It took us about six months from the time we got the space to put it into useable shape. Now we had reached the point where we had operating costs, an electric bill and telephone bill, for instance. One of our board members took it upon herself to write personal letters to all her friends. From this, she raised a total of \$1,200 which was the beginning. We approached the Industrial Acoustics Co., which manufactures prefabricated sound proof studios and requested a special price on a large recording booth. We had some funding leads which would pay for the booth so we ordered our first studio and had it assembled by volunteers. By the way, the booth in sections and assembled weighs about 4,000 lbs. Yes, the volunteers who put the booth together are still volunteering for us.

All this brings us now to early 1975. The first major donation which we received was from the Hearst Foundation. At this time, we were negotiating with several New York City radio stations which we had hoped would donate their sub-carriers to us. We had no luck in this regard. In fact the best offer we had at the time, was from WEVD who wanted \$1,400 a month for their sub-carrier. After several meetings they finally called us up one day to announce that they were leasing the sub-carrier

to a doctor's network for \$4,000 a month. So even though we were producing a limited radio service, we still had no leads on a sub-carrier.

In the meantime, we were getting more and more publicity. The New York Times had come by and I really can't recollect how they heard about us. New York Magazine did a small story on us and mentioned also that we had been encouraging restaurants to allow us to braille their menus for them. We got free time from Channel 5, here in New York, who video-taped a public service spot about IN TOUCH in their studios and had extra copies made and distributed to other stations in the area. It was great publicity and helped spread the word. We were also getting some very important help from Art Zigouras, who as you know, is Director of Public Education at the American Foundation for the Blind. I had absolutely no skill at writing press releases or public service spots. My basic experience had been 10 to 12 years in Wall Street. There's a technique which you need to get your story across, and Art helped us develop techniques and gave us leads as to where we might go to get stories printed.

Finally, in 1975, it got to the point where we needed someone, full-time, to run the outfit and I began devoting myself full-time to the service, unpaid along with my wife and three dozen part-time unpaid volunteers who worked as monitors, typists, editors "go fers." We then started pursuing more actively the fund raising part of the operation.

In addition to Hearst, we got donations from Exxon, CBS, Sperry & Hutchinson and some others. We staged our first fund raising event which was a "live radio show" in the White Plains store of Saks Fifth Avenue. This is something that I think many of you should consider. What the store did was open up on a Sunday and bring their employees in, on a voluntary basis. We put together material for a half-hour radio show, which turned out to be an hour, by the way. We put up a platform for a stage and set up a microphone with an engineer who could be seen by the audience. It really looked like the stage of a radio show done in the 1940's. Celebrities included Art Fleming, Sandy Baron, Joe Gargiola, Ralph Brance and Kathleen Widoes among others who read articles from magazines and newspapers. We also had an interview between Sandy Baron and myself. We charged \$7.50 admission and free champagne and hot hor d'ouvres were served. We netted something like \$2,000 which was very helpful to us.

We also got lucky again insofar as when I approached the McGraw Hill Corp. for a donation they indicated that they couldn't give us direct funds, but maybe they could do something

for us by say, providing space for an art show. I jumped on this idea and we set up our first art exhibit at the McGraw Hill headquarters building and 40 prominent artists, sculpturers, painters, photographers displayed their works. All proceeds of sale were shared 50-50 with IN TOUCH. We had a Salvador Dali work on exhibit and many other prominent pieces. One of the artists, Dorothy Abbott, a sculptress, helped select the artists, choose the works and arrange the setting up and dismantling of the exhibit. It was only a two day show unfortunately. These things should run for a minimum of a week. We did make several hundred dollars and received some publicity in Town & Country Magazine. But it was an experience for us.

We had a Celebrity Golf Tournament which was held at the Willow Ridge Country Club in Harrison, New York. In order to play in this one-day tournament with a celebrity, you had to pay \$100 and this would give you the privilege of playing with a Jose Ferrer, Enzo Stuarti, George Kirby or Willy Mays. In the evening, the players would have a free dinner with an open bar at the country club and get a free show put on by the participating celebrities. The production was supposed to run 45 minutes, but it ran over two hours. It was a smash. I believe we grossed about \$16,000 on this.

We also started having meetings with blind and handicapped people in our area and started building up our Consumer Program Committee. Subsequently, we also received a grant from the New York Council for the Humanities to produce a six-part documentary series dealing with the problems of the handicapped.

This brings us to September 1976 when we decided to move to larger quarters to get ready for the sub-carrier broadcasts which we knew were coming soon. We found 2,500 square feet in a professional recording building where we are now. At this time we were continuing negotiations with WNYC, New York City's radio station which had been dragging on for about 18 months. With the state of the city's fiscal situation, WNYC was uncertain as to what would ultimately happen with the station; whether it would be sold or set up under a separate non-profit corporation. They were reluctant to sign a contract until these matters were cleared up. Rather than wait for WNYC's situation to straighten out, we started talks with WKCR, Columbia University's radio station about leasing their SCA frequency. They expressed a great deal of interest and within three months we signed a contract with them for \$400 a month to begin broadcasting in July. The starting date would be contingent on the delivery of the receivers from the manufacturers. This was particularly desirable for us because WKCR is moving its transmitter and antennae to the top of the World

Trade Center. The range of our station will cover a good part of New Jersey, all five boroughs of New York, Nassau and Suffolk county, Westchester and Rockland counties and a portion of Connecticut. We had opened a segregated account in which we had deposited funds we had received from Lions clubs for this purpose.

I know my time is running out so I just want to tell you about a few of the programs we produce that are a little special. We started describing Broadway shows and got Ian Richardson to describe the staging and costumes of "My Fair Lady." John Cullum did the same for "Shenandoah" and Jerry Orbach gave visual descriptions of "Chicago." Volunteers recorded descriptions of what the city looks like, what the Statue of Liberty looks like, what the museums look like. A floor broker on the New York Stock Exchange described what happens there. We had sports people, Catfish Hunter, Rusty Staub and Randy Rasmussen of the New York Jets describe what plays look like, the uniforms and the layout of the stadiums as well. We also, on occasion, got celebrities to read on our program including Cliff Robertson, Sam Levenson, Dina Merrill, and I'm sure many of you know Leon Janney because of the hundreds of talking books he has recorded.

We are still pursuing a variety of different ways to raise money, which we all need. But our philosophy is that we must continue with our open channel broadcasts even when we are on SCA. The only way to reach the 50% of the handicapped population not receiving services from anyone is through the friends or relatives who see the radio listings or accidentally tune us in.

Open channel broadcasts will help us reach as many listeners as possible. In addition, these broadcasts have proven to be a very important public education vehicle.

Well, this is where we are today and that's how we've gotten this far. Our main theme is to bring current information to people who can't get it anywhere else so that they can help themselves. I'm sure this is the theme of all of the other services here today and I want to thank you very much for letting us tell our story.



NEW DIMENSIONS IN RADIO READING SERVICES: AN UPDATE
ON THE STATE OF THE ART

Rosie Hurwitz
Audio-Reader
Radio for the Blind and Physically Handicapped
Kansas University
Lawrence, Kansas

Audio-Reader, the second established closed circuit Radio Reading Service for the print handicapped is alive, well and growing at the University of Kansas! Originally conceived by a local philanthropist as a service to "former avid book worms who could no longer avail themselves of the finest of classical literature," it now serves roughly 3,000 people in an 85 mile radius around Lawrence, Kansas and some sections of Southeast Kansas, via microwave and CATV relay transmission. Current programming includes not only twice daily regional newspapers, 4 hours a day of current books, (including occasional classics) and periodical information, but feature programming designed to inform, stimulate, educate or just amuse and entertain our special listeners.

Let's go back to our philanthropist. She spent a number of years wondering if such a concept was possible. Finally, in September of 1970, she put an ad in the New York Times, asking for information about the feasibility of such a service. The Library of Congress Librarian for the print handicapped answered her ad with the news that indeed it was possible and Minnesota was providing just such a service.

On October 11, 1971 Audio-Reader went on the air -- KANU-FM, the public broadcasting station of the University of Kansas with the help of a brand new transmitter purchased by our friend, provided the use of its sub-carrier. Our wonderful lady bought four Ampex tape recorders, 500 individual receivers, a cart machine, a turn table, SCA monitoring equipment, countless reels of recording tape, a typewriter, and hired two staff members. The audio console was an Altec, 15 years old, that parent station KANU was going to cannibalize for parts. It's still in use. Since the University of Kansas didn't see the Audio-Reader program as falling properly within its academic funding responsibility, our philanthropist funded the program by herself for a year-and-a-half. At the end of that time, the State Library took it over as a line item in its budget for one year. The state legislature then agreed to fund the program and the University of Kansas to administer it, and such is our status today.

Sounds pretty good, doesn't it? A secure, dependable funding base, but remember, Audio-Reader is a non-academic program housed in an academic institution. As an educational

rather than academic program, we occupy the lowest priority rung on the funding ladder, both in the University's regular budget requests and through appeals to the Endowment Association. Consequently, generous alumni could not be approached by Audio-Reader for help. Another year passed and the program more than quadrupled in size, due to central hospital and nursing home installations, plus the addition of another 200 receivers. We were still housed in the kitchen and maids rooms of an old limestone mansion on the north edge of the campus. Total space for our growing program was just 700 square feet. We had the most dedicated, talented volunteers and students anyone could have, but we had an awesome stack of receiver applications we couldn't fill, our old audio-console began to show its age, and we were falling out the windows, due to space problems - - What to do?

We invited some influential members of our community to form an advisory committee. Members of this local advisory committee include the publisher of the local newspaper, the owner of the local commercial radio station, a state legislator, the retired director of State Services for the Blind, the presidents of the Kansas Association for the Blind, the Kansas Federation for the Blind, the president of a local film company, a local physician, two attorneys, several retired business men and volunteers working in the program. Similar Audio-Reader Advisory Committees have been established in each of our new broadcast areas, in order to find eligible listeners, to distribute receivers, and to evaluate service. These groups also serve as fund raisers to pay cable TV subscriptions for those who need this help, to provide funds for additional receivers in their areas, and to provide input to the state legislature about the needs and goals of the Audio-Reader program, when appropriate. Consumer advisory committees are presently being organized to provide more information about the quality of the programming and to suggest other areas that need to be covered.

Things began to look up. The state legislature appropriated an additional \$20,000 for us above and beyond the request submitted by the University. The money enabled us to hire a third full-time person in addition to our student hourly announcers and part-time secretarial help, and also gave us enough match money to apply for a vocational rehabilitation grant that would permit us to expand our service both in broadcast radius and in the programming concepts. These concepts include programming from Vocational Rehabilitation Centers throughout the state. To ease the space problems, at least temporarily, our committee helped us find an old mobile home and convinced the University Administration that ugly or not it should be placed on the grounds of our present studio location to add another 450 square feet. The trailer was completely remodeled to include an office area, three recording studios, a live roundtable studio and a control room. If there's such a thing as ugly - beautiful - this is it. Our current space in use is 1,150 square feet. However, University plans are underway to

construct a Communication Center on the campus and Audio-Reader will be one of the occupants of that new facility, with our space designed and constructed specifically to meet the needs of our soon-to-be realized statewide service.

How did we get the grant to make our expansion possible? Since the University did not want us to interfere with their own most urgent needs for endowment funding, the Administration asked the Dean of Research Administration, Dr. Henry Snyder, to explore with us possible federal grants which could help us achieve our goals, and extend our rather meager state budget. We discovered through Dr. Snyder's help that we were eligible for Educational Broadcast Facility funds from the Office of Education, Department HEW, and made application for a \$37,500 equipment grant. Our local advisory committee raised the 25% matching funds of \$12,500 in 4 weeks. We didn't get the grant and later used the match money to buy and revamp the trailer. Then the Director of State Services to the Blind, Harry E. Hayes, heard about the Ohio grant and wrote for more information. Without his continuing help and that of Dr. Snyder, we'd still be stuck on square #1. Working together, they put us in touch with the Vocational Rehabilitation people at the State and Regional levels, helped us develop a program, and we submitted the grant. It's a three-year proposal. The first year's funding of \$100,000 provided the sorely needed audio consoles, tape recorders, cart machines, turn tables, relay equipment and receivers. The second year which we have been told unofficially is ours, is another \$100,000. This will help provide central hospital installations, test equipment, and some staff in the form of additional hourly money for announcers to facilitate a longer broadcast day from 8:00 a.m. until midnight. This grant also includes a rehabilitation program director/producer to implement our most carefully formatted rehabilitation programming and a field engineer to interface with CATV and microwave people, to install central hospital receiving equipment across the state and to assist Tom Fish, Audio-Reader's Assistant Director and Engineer. And, of course, the grant provides for more individual receivers. The third year of the proposal will include continuation of the staff and additional receivers. At this point, we plan to have a statewide network established with vocational rehabilitation programming as an integral part of our feature programming schedule.

Let's talk about programming - the most important aspect of any broadcast operation in terms of its listeners. Our philosophy is to provide that which is interesting, valuable and isn't available elsewhere. For instance, we didn't carry President Carter's Inauguration. It was available on our main channel and everyone else's as well. We announced it was available and continued our regular programming. Nor do we compete with that excellent program the Library of Congress provides. We air only 4 hours a day of books, as current as we can find (plus an occasional classic) because some of our

listeners are so physically handicapped it's not possible for them to handle cassettes. Sheila Merrill, the Director of State Library Service for the Blind and Physically Handicapped, feels it takes some of the pressure off her program to have new things available via Audio-Reader before the Library can provide them. We are currently providing two hours each morning from 8:00 a.m. to 10:00 a.m. of regional newspapers and one hour in the evening of local and regional newspapers. We will expand the evening newspaper time as soon as possible. From 10:00 a.m. to 11:00 a.m. we air a book, a work of non-fiction. One of the most interesting aspects of our programming occurs at 11:00 a.m. each morning with Audio-Reader Round Table, the special feature portion of our broadcast day. At this time we air programs about consumerism, the arts, what's new in science, sports in review, poetry, medical programs, mental health series, rehabilitation programs, features of special interest such as reports from the state legislature and, of course, Al Sperber's excellent program, "Out of Sight." Some of our programming comes from outside sources, such as Radio Canada; some we receive from the Kansas State University Extension Division. Most of it is produced at Audio-Reader, calling upon the time and talents of our University Faculty, volunteers in the area, and students; some of whom work for University credit and some as volunteers. Another feature hour called most appropriately The Kitchen Sink is aired daily from 12:00 to 1:00 p.m. It contains light features in the newspapers and from the A.P. Wire special bulletins and announcements of meetings of interest to our listenership and the T.V. Guide from our current sign-off time at 7:00 p.m. Tucked in the middle at 12:30 is a 15 minute feature - for example, Horticulture for the Handicapped, done by the County Extension agent in Topeka, who worked with the staff at Menningers before formulating this series, Natural History Notes, with the curator from the Museum of Natural History of the K. U. Campus, This 'n That, articles from the Capers Weekly and other short features with Nona Thompson, a volunteer, Kansas Editorial Review, and others. During The Kitchen Sink we also feature regional happenings from newspapers from various parts of the state.

From 1:00 p.m. to 4:00 p.m. we air three books; from 4:00 to 5:30 p.m. we simulcast with the main channel All Things Considered from NPR; 5:30 to 6:00 p.m. Those Thrilling Days, old radio soaps of the 30's and 40's, and from 6:00 p.m. to 7:00 p.m., the evening newspapers.

Our Vocational Rehabilitation programming is somewhat different from the Ohio project. Our concept provides for the sending of a two-person team; the vocational rehabilitation program director/producer and the field engineer to each Rehabilitation Center in the state. Each visit of several days duration, depending upon the size and scope of the center, will include extensive taping of classes and projects in progress,

interviews with staff members and clients and a tour of the facility itself. The many hours of taped information will be brought back edited and produced in order to provide an audio-portrait of what each center provides, the personality of the staff, as well as the layout of the physical plant. The length of each rehabilitation center series will depend upon the scope of the program. It is hoped that approximately 8 to 12 hours of finished programming may result. With the installations of central hospital receiving equipment, it is hoped that patients will know immediately what is available in the way of rehabilitation to assist them in their needs to achieve new skills and maximum independence. Those who are eligible may apply for their own receivers when they return home. The home receiver unit will, in turn, introduce the client's family to the rehabilitation program and may also reinforce what he has learned when he returns home from his training. To assure the effective use of the vocational rehabilitation programs, each hospital in the state will be given a list of the vocational rehabilitation centers, their locations, and a brief description of the services offered. In addition, as each vocational rehabilitation series is completed, a summary of the programs on cassette will be sent to each hospital, thus establishing a cassette library of information available to anyone at any time. Not every hospital will be able to have a central Audio-Reader receiving unit, due in some cases to inaccessibility, and in others the age of the structures and the condition or nature of their central wiring systems. However, the Audio-Reader cassette library can be available to all, thus making maximum use of this information.

The equipment purchased on the grant is of the highest quality. It is designed to last 20 years or more, with a minimum of maintenance. It includes a McCurdy Dual Channel monaural audio console with a 32 input-2 output capability with a noise figure of -124 db for air and minor production. For years Audio-Reader had to rely on "bailing wire and chewing gum", a meager or non-existent budget and no engineer to maintain the equipment.

The decision had to be made whether to buy inexpensive studio equipment and many receivers on this first year of the grant or good studio equipment and fewer receivers. Obviously, we chose the latter - the thinking was that the opportunity to upgrade the studio equipment rarely presents itself and our equipment needs were obvious.

The equipment we ordered was not only the McCurdy console but a 4-channel Audio Designs production console with variable equalization to correct and electronically enhance programs of less than ideal technical quality. Much of the programs would be coming from cassette and reel-to-reel machines in the field. We also ordered Condenser microphones, better tape machines with more cassette recorders, which were needed to

replace ailing machines on the air and in the recording studios as well.

With the probability of producing rehabilitation programs, we had to purchase durable remote equipment that would withstand hard and constant use. Having two consoles would permit us to utilize the daytime hours for production in either the air studio during long programs or the use of one or more channels of the Audio Designs console for more efficient use of the studios and minimize overtime hours. The additional channels could also be used for transfers from one recording media to another - all of this happening simultaneously.

The 4-channel console could permit networking to the various parts of the state. The 4-channel console could be also used as an "on the air" center for split programming... originating one or more separate channels of audio information to one or more geographical areas of Kansas. Audio-Reader uses frequency converters designed to interface with microwave companies and transmit the signal to communities beyond the normal broadcast radius of the main channel. These converters currently place our signal on cable systems in four communities in South Eastern Kansas...and plans are to include more communities now not being served. There is no public radio or television network on which we can ride presently...so we must rely on microwave companies, cable television and other available commercial sub-carriers in the state. This is all very challenging to us and the possibilities for regional or perhaps national programming seem even more exciting. We have come a long way from that day in October 1971.

The most significant factor in the growth of Audio-Reader was the temperament and enthusiasm of our Advisory Committee. These are people whose dedication to providing Audio-Reader service and determination in the surmounting of bureaucratic obstacles simply knows no limits. Their belief in the value of the program, the confidence they have expressed in our ability to expand and improve the service, made it possible for us to keep forging ahead in spite of the size of the problems. Our statewide service will become a reality in about three years. Three to five years from now we may be housed in a beautiful new building. We will have the best equipment available to provide a good clear signal, and, with the additional staff, help in providing imaginative, innovating programming. Perhaps by that time separate line item status in the University budget may also become a reality, thus making clear the legislature's interest in an ongoing service to the print handicapped throughout the State of Kansas. These are our goals. We've come a long way and we are confident of achieving them.

NEW DIMENSIONS IN RADIO READING SERVICES:
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Robert Morgenstern
Assistant District Manager
Office for the Visually Handicapped
Pittsburgh, Pennsylvania

The Pittsburgh Experience: Inception

The Pittsburgh Radio Reading Service for the Blind experience began with the attendance to the American Association of Workers for the Blind National Conference held in Cleveland, Ohio, July, 1973. Mr. J. Paul Hamilton, Regional Specialist for the Department of Public Welfare and myself, a recent graduate of the University of Pittsburgh Graduate School of Social Work, also with the Department of Public Welfare and a consumer advocate affiliated with the Golden Triangle Federation of the Blind were privileged to attend this conference. At that conference the Minnesota Radio Talking Book Service was being demonstrated. It did not take much of a demonstration to point out the importance and value of such a service for blind people. At last the provision of a very meaningful service to the entire blind population is now possible. Given a little imagination, adequate equipment, dedicated staff and the generosity of many volunteers, it is now possible to provide the reading of a wide variety of current material that to date has been unavailable to blind people. This one service can be meaningful to young and old, homebound and employed, the serious minded and the light reader.

Upon our return to Pittsburgh we set about exploring the possibilities of providing such a service in the Southwest Pennsylvania nine county region. It was our belief that one good service would be better than providing several inferior services that would be duplicative of time, energy, money, staff and material. Our exploration took two distinct routes. Mr. Hamilton as Regional Specialist for the Blind had the responsibility of developing social service contracts to visually and physically handicapped persons. Prior to January 1, 1975, these services were provided under Title 4A and 6 of the Social Security Act. Preliminary proposals met with considerable opposition. However, this did not dampen our spirits.

At the same time exploration at another level was occurring. Being a strong believer in consumer involvement, feelers were put to the blind community regarding the need for such a service. The Golden Triangle Federation of the Blind was very receptive to the need for such a service and wanted very much to be

involved in the establishment and maintenance of a radio reading service. It was the belief of G.T.F.B. that in order for the service to be truly meaningful, it must be coordinated by people familiar with the problems of blindness and willing to meet their needs.

We set about the task of researching the feasibility of establishing and maintaining R.R.S.B. for Southwest Pennsylvania. A survey form seeking information and data on technology, programming, staffing, financing and other necessary data was developed to use existing services throughout the country. The response was very good and much of the information received proved valuable.

The value of sharing of information cannot be overemphasized. A priority area of concern was find an FM station interested in the project. After approaching other FM stations, a young Ph.D. Candidate, Mr. Tom Ammons from Duquesne University contacted us regarding the possibility of utilizing the University station WDUQ FM. In December, 1974, after much exploration and research the Golden Triangle Radio Information Center was incorporated. GTRIC is a non-profit corporation which is largely consumer based but also includes in its membership any person interested in its goals and purposes. Several meetings were held with Mr. Ammons and Dr. Kenneth Duffy, Station Manager. In January, 1975, two very important developments occurred.

The Mini Program

We began a mini program consisting of the reading of the morning paper, the Pittsburgh Post Gazette for one and one-half hours per day, on the main channel. The purpose of this mini program was two-fold. First, it gave exposure of the kind of programming that could be expected once we began our full program on SCA. Secondly, it generated public awareness of the type of service which was being developed. This public awareness proved to be of considerable value to us later when seeking support for the service.

Title XX

At the same time, January 1975, Titles 4A and 6 were absorbed by the new SSA Title XX. A review of the provisions of Title XX indicated a liberalization of the scope of the program. After considerable opposition the Department of Public Welfare was convinced that RRSB was a valid service within the scope of Title XX. GTRIC submitted a proposal through Mr. Hamilton

to the Department of Public Welfare. The proposal consisted of a primary contract with GTRIC and a sub-contract between GTRIC and WDUQ. The sub-contract included transmission rental, rental of floor space and permitting WDUQ to employ the staff. The primary contract designated the overall responsibility would be that of GTRIC. This included the determination of eligibility for the service and the distribution of the receivers. This proposal in the amount of \$151,000 included the purchase of 1,000 receivers, office and studio equipment, salaries and rental costs. It should be noted that under this arrangement only persons eligible for Title XX can receive the service until other funding sources are developed. Although this method appears to be of a discriminating nature, it permitted us to receive our initial equipment and begin programming on July 1, 1976 at six hours per day. Since then, we have increased our programming from six to twelve hours per day, seven days per week. Now that we are established, we are certain that additional funding will be much easier to secure.

Although Title XX has been discussed with other radio reading services, it has met with negative response: That be that it excludes persons who are not Title XX eligible for the service. This negative attitude should not be encouraged. Title XX should be considered as only one avenue of funding for on-going operating expense. It is our experience in dealing with foundations and other funding sources, that a diversified approach to funding is absolutely necessary.

The Golden Triangle Reading Information Center was established to develop and maintain a radio reading service to the blind and print handicap of Southwest Pennsylvania. This includes a nine-county area with a potential population of 10,000 readers.



NEW DIMENSIONS IN RADIO READING SERVICES:
AN UPDATE ON THE STATE OF THE ART

The Ohio Story

Walter Boninger
Associate Executive Director
Community Services
Cleveland Society for the Blind
Cleveland, Ohio

When one is the last speaker on a panel there are two nightmares. One has come true -- that the time has run out, but I hope you will bear with me as I try to share some of the significant aspects of the Ohio Story. The other nightmare is that the preceding speakers have already said what you're going to say. This has not happened. It has been interesting though, to note the commonality of problems, the commonalities of our histories, and it is most exciting to see how we have all learned from each other. Ohio is thankful to Pittsburgh for its leadership with Title XX, because we hope to go in that direction. It is rewarding to see other states obtain funding by making use of Ohio's original proposal with its rehabilitation focus.

My focus in sharing The Ohio Story with you will not be so much on the programs of the individual communities, but rather on the organizational aspects and how the state-wide concept developed and was nurtured. Like everyone else we first learned about Radio Reading Services from Minnesota. The original reaction in Ohio was "Gee, that's a nice idea, but it's terribly expensive." As we began thinking about it we came up with the idea that, in addition to reading newspapers, magazines and books that this service had a rehabilitation component, that there could be an opportunity through the use of closed circuit radio to share information with the newly blind, with the person who has just been through rehabilitation and now is waiting for something to happen, for the elderly whom a rehabilitation teacher can only visit a few times and then leaves them to their own devices. It is this aspect of programming we have called the rehabilitation content, or lately, innovative programming.

In December 1974, with this concept in the back of our mind, the Director of the Ohio State Services for the Blind invited representatives from all the agencies, the organizations of and for the blind, representatives of radio stations, to an informational

meeting. Our guest was William Gallagher from the American Foundation for the Blind, who in turn suggested that we invite Sam Holt who at that time was doing a study on Radio Reading Services for the Corporation of Public Broadcasting. They answered our many questions about the service, and as a next step in implementation suggested that we form a committee. In the beginning it was called the Ad Hoc Committee and later became known as the State Committee for Radio Reading Services.

Just a few months later in March of 1976 the first AFB sponsored national Radio Reading Conference took place in Oklahoma City. Thirteen persons from Ohio attended that Conference -- the largest delegation from any state outside of Oklahoma -- and we learned a great deal more about Radio Reading Services, its programs and techniques. We came back to Ohio with new enthusiasm and learned that in all likelihood there would be some Innovation and Expansion funds available through the Ohio Rehabilitation Services Commission. In the meantime the State Committee had become organized with representatives from five communities including Cleveland, Columbus, Athens, Youngstown and the Tri-County Area serving Kent, Akron, and Canton. Originally the Committee thought the only way we could get this proposal funded was if all the five communities were included. The proposal included programming with significant innovative and rehabilitative content as one more means through which the Rehabilitation Services Commission could insure that rehabilitation benefits provided by the Commission were retained. The Commission, however, instead of giving some funds to all the participating communities, chose to give its resources only to Cleveland and Columbus. Their reasoning was that these communities had the most extensive resources, were most likely to succeed with the programming, and could develop financial resources when grant monies expired. Columbus at that time had been able to obtain some revenue sharing funds. This was fortunate, because even though they got monies from the Rehabilitation Services Commission under the initial proposal, they only used a small portion. Through the work of the State Committee it was eventually possible to bring two other communities on the air -- Youngstown and the Tri-County area. At this point four stations are on the air but in every section of the State there is a committee organized and moving forward with the development of Radio Reading Services.

What are some of the unique ingredients in Ohio's success story? One of them is certainly the support of the Rehabilitation Services Commission. Not only did it provide funding, but it also assigned Betty Willson, Program Specialist for the Talking Book Program, to serve as Acting State-Wide Coordinator for Radio Reading Services. In Ohio Talking Book Machine distribution is handled through the Rehabilitation Services Commission

and Mrs. Willson's job includes traveling throughout the State, working with the machine agencies and the Pioneers and all the other organizations serving blind and physically handicapped persons. She comes in contact with the same persons who have an interest in developing Radio Reading Service and through her role the various communities in the State were encouraged to work together in the development of the program.

A second unique aspect of Ohio's program was the innovative and rehabilitative programming. Programming was developed to deal with all aspects of daily living, home care and repairs, personal care and fashion, nutrition and consumer information, communications and mobility, and relationships to family and friends.

A third major ingredient and perhaps the most significant has to do with independence and inter-dependence. So far in other states which have more than one station, there are one or two patterns. Either they are all broadcasting exactly the same as it estimates from State headquarters, or several stations in a state are each doing their own programming without any awareness or interconnecting link between the various stations. In Ohio from the very beginning the idea has been to allow each community to develop its own organization and that particular approach best suited to that community's needs, while at the same time maximizing every possible opportunity for cooperation. For example, two stations are organized under a private agency of the blind and are housed within it. Two others are set up as separate corporate entities. As for program, each station has total autonomy, which allows adequate time for local newspapers, advertisements and other local programs. Yet books, magazines, general consumer information and much of the innovative and rehabilitative programming is really the same for all areas in the state. Mechanics have been set up to exchange this kind of programming, and we will refer to that a little bit later on.

We have also been fortunate in the fact that we have had the cooperation and total involvement of all segments of the blindness system and the physically handicapped. Even though there were some hard feelings -- I don't think it is any secret that the National Federation for the Blind is not that fond of some of the things the Cleveland Society for the Blind does -- but in this particular area we have been able to work together effectively.

The State Committee meets four to six times a year. In the beginning there were many important issues to be resolved.

One was the choice of names. We did choose "Radio Reading Service", because at that time it seemed to be the emerging name. In that way, we in Ohio could benefit from other national publicity the program would get. We decided from the beginning that eligibility for Radio Reading Service should be the same as it is for Talking Book. From the beginning consumer participation was an important aspect and the first Interim Guidelines, in addition to a Technical Committee and a Finance Committee, called for a Consumer Interest Committee. Yet when the final State Committee By-laws were adopted with five permanent sub-committees, not one of them bore the name "Consumer Interest." In the course of discussion over several months it became clear that consumers had input into every committee that needed to be established. This was not because they were consumers, but because they had knowledge and information which any particular committee needed. Currently twenty of the State Committee's 35 members are consumers. The Committee's By-laws require that at least two of the five delegates to the Committee from each established local community be consumers. It can really be said that consumer participation in Ohio's Radio Reading Services has not been superficial or occasional, but sincere and complete with consumers, who may or may not be professionally involved with work for the blind, who may or may not belong to organizations of and for the blind, working together with sighted professionals and lay persons in a genuine partnership of program development.

In many ways Ohio is a miniature of what is happening in the rest of the country. One of the issues with which we struggled is that of incorporation. Should the Committee incorporate as a separate fund-raising entity? In the beginning we leaned toward incorporation, because we assumed that every community in the State would have a reading service and that the State Committee, on a state-wide basis, would do the fund-raising. It became apparent soon enough that each community would evolve its own local corporate entity, do its own fund-raising, and it was decided that there really was no need for the State Committee to incorporate as a separate entity. A little later along the way we realized that a full-time state-wide Coordinator was needed and again the same question of incorporation had to be faced, the same question which now faces the proposed national association. Should we incorporate as an independent entity and try to raise funds to hire that State-Wide Coordinator, or should we affiliate with an existing organization in Ohio for this kind of service. We chose to affiliate with the Ohio Educational Television Network Commission which is that group in Ohio within the State government which coordinates all the work of public television and radio stations. The Commission

had worked with us from the beginning and had expressed an interest in assisting in the coordination of Radio Reading Services. We are at a point right now where we are becoming engaged in fund raising efforts for the State-wide Coordinator. We chose the Commission rather than the independent route, but this does not necessarily mean that Ohio thinks that that is the way the National should go. It is only the way it works best in Ohio.

We also decided early that there should be a fee for the service, that consumers should be asked to participate in the funding. This has been done and contributions ranging from \$15 to \$25 a year are being asked. Scholarship assistance is also available for all those who cannot afford it. Since the source of future funds was of real concern, each community was encouraged to pursue alternate sources of funding and to develop organizations of their own while at the same time participating in the State Committee.

The State Committee developed its own set of By-laws. Each community with an established Advisory Committee could send as many as five delegates to the State Committee, and if a community did not have an established organization these communities could be represented on the State Committee as well. Provision was made for members-at-large, allowing for representation at the State level from such organizations as the Rehabilitation Services Commission, the National Federation of the Blind, the State Library of Ohio, the Telephone Pioneers, the American Association of Workers for the Blind, and interested lay persons. Provision was made for ex-officio membership so that there could be representation from the Corporation for Public Broadcasting, the American Foundation for the Blind, and the Ohio Educational Television Network Commission. Dues of \$10.00 per person annually were established.

Attempts were made to do on a state-wide basis whatever could be done so that each community did not have to do it on its own. For example, we developed a state-wide logo, a microphone superimposed on a map of Ohio. Promotions could also be handled on a state-wide basis. Originally we developed a sound sheet that promoted Radio Reading Services, deliberately not giving any of the specific information for the local community, but referring to attachments and enclosures that came with the record. We are currently revising this sound sheet because after having been on the air for a year and a half, the content would be quite different than it was at the time it was first developed before we were even on the air. It is being revised by a sub-committee of the State Committee. We are currently developing a common application that can be used state-wide and other promotional material helpful in fund-raising.

In this brief summary we are deliberately staying away from details involving the individual communities. These are available in "The Ohio Story" and in a special Public Relations Manual that can be obtained through Betty Willson's Office at the Ohio Rehabilitation Services Commission.

More important for this presentation is the way in which stations worked together. For example, The Tri-County area is now re-broadcasting most of Cleveland's programming except for two hours in the evening during which time they read their own local newspapers. They are currently training volunteers and soon will be expanding their local programming. In Cleveland we have purposely arranged our schedule so that between 11 A.M. and 1 P.M. we do those things which are of particularly local interest, so that other stations, which pick up our network programming, can use those two hours for their local programs. Youngstown is waiting for our parent station to move to its new transmitter site and we hope shortly to have similar arrangements with Youngstown as we now do with Tri-County. In addition, however, it is possible for a local station to do its own station breaks, have its own spot programming, have complete independence and still pick up those programs that are of general interest.

One of the things which has come out of the State Committee is the organization of a formal program exchange with the assistance of the Ohio Educational Television Network Commission. The Commission uses the same mechanism that it uses in exchanging programs among public radio stations. Each Radio Reading Service submits to the program exchange information about those programs which it thinks would be of interest to other communities. Those communities who want this program can simply write away for it and tapes are made available. We have now also set up the mechanism whereby communities outside the state can send away for a particular program for \$2.00 per tape, really just enough to cover the cost of labor and materials. The program exchange is still in very early stages. Within Ohio, while there are some programs being regularly exchanged, it is not being used as much as I know it will be, particularly once rehabilitation funding runs out. What is important however, is that we have the mechanism set up. We're also aided by getting mailings from Jim Jones "IN TOUCH" and from the American Foundation for the Blind. We're using these programs and are grateful to them and use this means as a way of saying thank you.

The climax of our year was a State-wide Conference in February 1977. We had 136 people registered. Most were from Ohio. They included listeners, volunteers, and staff people. The really exciting part, and I would recommend it to anyone who can do this, was the bringing together of volunteers with the

listener. The interchange that took place between these two groups that usually do not have a chance for direct communication was most heartening. Again we are grateful to the Ohio Rehabilitation Services Commission for funding this Conference.

As more communities within the State are becoming interested in Radio Reading Service and participating within the State Committee, we are revising and updating our By-laws. We have activated other committees on Standards and Evaluation, on Community Assistance & Development, and on Public Education. Most recently we have pushed for inclusion in funding under Title XX. With the assistance of staff from the Rehabilitation Services Commission there have been several meetings with Title XX officials. Radio Reading Services are being recognized as legitimate services entitled to funding. Unfortunately this does not make it automatic. In Ohio we must negotiate contracts individually with each county. However, the State Department of Public Welfare has set up a special meeting for providers of Radio Reading Services to instruct us in how to negotiate these contracts and to answer all our various questions. To our knowledge they have not done this for any other group of providers.

Cincinnati, Toledo, and an area serving Ashland, Mansfield and Wooster are all getting organized. Even the rural southern area of Ohio centered in Athens is hopeful of achieving some interconnection with the Columbus program. In Ohio we firmly believe that Radio Reading Services are here to stay and that they have within their capabilities to meet major unmet needs for current information and to remain as they have become in Ohio, an important adjunct in the daily lives of blind and physically handicapped persons.

It is said that the longest journey in the world begins with a single step. Looking back upon the history of Radio Reading Services in Ohio, it is hard to know just what that first step was. Officially it was the meeting on December 19, 1974. Unofficially that step was taken by many who talked and dreamed Radio Reading Services long before they became a reality in Ohio. Since those moments we have taken many steps together in a thrilling journey. It is a journey which in many ways has just begun. Many more interesting chapters remain to be written.



GENERAL PRINCIPLES OF PUBLIC RELATIONS

(Notes used by the speaker)

Bernard Posner
The President's Committee on Employment
of the Handicapped
Washington, D. C.

OBJECTIVE

Every PR effort should have a clear-cut objective that gives direction to our activities. Nothing vague: not "to make the radio system more acceptable to the general public," or "to make everybody aware of the system." That's Mickey Mouse. Rather, the specifics: to encourage more blind people to make use of it; to obtain more volunteers; to let potential donors of funds know about us."

PUBLICS

Most of us are tempted to think in terms of reaching a non-entity called "the general public." No such thing. Think in terms of specific publics you really want to reach. Suddenly, the PR efforts take on a flesh and blood quality. You are thinking about people, not abstractions. For example: would-be volunteers (retired persons, radio newscasters looking for volunteer work, wherever volunteers come from); blind people (those who've been through some system of service delivery or other so they're identifiable and reachable); possible donors (the charity-minded moneyed segments of the community).

OPINION MOLDERS

Publics don't really respond to mass media appeals. Newspapers and magazines and TV really don't sell. They soften up. What really sells is the word of the opinion molder, the person we turn to when in doubt (and we so often are in doubt). Determine the opinion molders for each public you want to reach, and think of ways of going after them, specifically. For example: who's the opinion molder for retired teachers who might want to volunteer? The organization they belong to?

MEDIA

We tend to think of public relations in terms of getting out a press release and expecting miracles. No, no. Instead, we should decide which media (plural) might best reach each individual public you want to reach. No single medium can do the trick. What's needed is a mix of media, all aimed in the right directions. There are plenty of media directories to help.

PERSONAL CONFRONTATION

One factor essential in reaching people is the person-to-person factor. That's really the way we come around and change our minds. There ought to be some way to bring into the plan a person-to-person meeting. A conference does this. An open house does it too. Some way for humans to see humans.

FEED BACK

All of what we've said so far is the dishing-out phase of public relations. There's also a receiving phase. We have to be sensitive to what people are saying and thinking. This doesn't merely mean watching clippings and counting inches. It means becoming active in the leadership of publics we are concerned with. It means listening closely to complaints and criticisms. It means keeping our ears open and our mouths shut.

SPECIAL EVENTS

Every public relations effort needs a period of intensified promotion -- a special event, a media event, a staged event. Call it what you will. The easy-to-stage ones are special days or weeks or months. No special arrangements to get these; merely proclaim your own day or week or month. Open house is another way. Anniversaries. Annual meetings. Contests and awards. All kinds of media-attracting things exist. Use them. At least once a year.

TOP TO BOTTOM

Public relations begins everywhere in an organization, and we often forget it. Surveys ought to be conducted to find out how the telephones are answered; how letters are replied to; whether all people are truly being helpful in relating to the public. The messenger is a PR man. So is the manager. PR is top to bottom and all points in between.

COUNSEL

Many people in PR do their thing and never bother to become involved in the decision-making processes of top management. They should. Public relations should be a tool of management. Decisions should always keep possible public relations in mind. We're not just publicists. We're advisors too.

YOUR OWN POINT

Everybody has his or her own favorite PR point. At this point, insert your own PR point. And carry it out.

And good luck.

REACHING CURRENT USERS OF REGIONAL LIBRARIES

Ms. Frances Ezell, Librarian
Tennessee Library for the Blind and
Physically Handicapped
Nashville, Tennessee

Back in 1974 when the Nashville Public Library was making plans to start a radio reading service to the blind and physically handicapped, The State Library and The Regional Library for the Blind and Physically Handicapped jumped on the bandwagon. Of course, we would be most happy to be part of this service.

We saw this as an opportunity to help the patrons already being served by the library. Not only that, but it would be a way of reaching people we were not already serving.

A Pilot Project under LSCA with these federal funds being used to purchase 1100 initial receivers.

Letter announcing service and application sent out under the Tennessee Library for the Blind and Physically Handicapped letterhead -- Applications returned to the library and certified by the regional librarian. Names and addresses of library patrons were made available to radio station for mail out. Books aired by radio station made available to the library for distribution once copyright clearance has been obtained.

Since program has started:

1. Library staff tell about Radio Service when speaking to any group - also take receiver and applications along.
2. Tell people about radio service when they inquire about Talking Book service. Send applications to potential users.

I think many times librarians or radio people may feel that one program endangers the other. We have found this to be just the opposite - one program compliments the other. Neither program can take the place of the other. For the reading of current materials---newspapers and magazine articles the radio can not be beat, but for reading a book at your leisure and magazines on a regular basis, the Talking Book is the answer.

Remember each program answers a need for reading material to that blind or handicapped person. Put both these programs together and you are moving one step closer to providing TOTAL library service.

REACHING INTO THE AGING NETWORK

David Jeffreys, Ph.D.
Assistant Professor of Social Work
Department of Sociology
Winthrop College
Rock Hill, South Carolina

Just as there is a blindness network, so there is an aging network, and this network must be understood if those persons responsible for radio reading services are to work effectively with the agencies and organizations whose responsibility is to serve older persons.

The aging system has public and private sectors. The public sector has been fashioned, in large part, by the Older Americans Act, which created the Administration on Aging within the Department of Health, Education and Welfare. In each state there is a state unit on aging, sometimes known as a commission, a council or an office on aging, created by legislative action or by executive order. In recognition of the need for a coordinated approach at a level lower than the state, a network of Area Agencies on Aging is now being created. There are more than 600 AAA's in operation and soon every part of the country will be served by an Area Agency. In addition to and usually operating cooperatively with the Area Agencies there are thousands of city and county commissions and committees on aging.

The state unit on aging should be a primary contact for a radio reading service, particularly if the service operates on a statewide basis. The state agency, located in the state capital, is charged with planning, coordinating and funding programs for older persons, and also serving as their advocate. The Area Agency has a comparable set of responsibilities in its jurisdiction, which could be a city, a county or a group of counties. In a few states, generally sparsely populated or small in size, the state unit on aging functions as an Area Agency.

All elements of the aging network have been charged with seeking out and serving handicapped and isolated older persons. Most of these agencies, because of their many other responsibilities and their lack of experience in this aspect of service, have not given high priority to the handicapped and isolated older person. Many of these agencies should be receptive to an overture from a radio reading service, representing

as it does a new approach to reaching and serving older persons with visual impairments. Through outreach and other measures, these agencies can be a means of reaching new listeners for radio reading services. They should also be regarded as potential sources of funding and as suppliers of news for radio reading service audiences.

On the voluntary sector side of the aging network, the mass membership organizations of older persons are valuable resources for reaching new listeners, furnishing news and feature items, playing an advocacy role for your service, supplying volunteers and possibly making funds available for radio reading services. The retiree membership organizations are many and varied, with the principal national units being the National Retired Teachers Association--American Association of Retired Persons, the National Council of Senior Citizens and the National Association of Retired Federal Employees. Some labor unions also have extensive programs for their retirees. State and Area Agencies on Aging can usually provide information on local chapters or affiliates of these groups, as well as directories of independent senior citizen and golden age clubs.

Dorothy Demby, Program Specialist on Aging at the American Foundation for the Blind, and the Foundation's six Regional Consultants have established meaningful contacts with the aging network at their levels of operation. If you have not yet reached into the aging network in your state or community, such an approach might produce long range beneficial results for your program and for those you serve.



TITLE XX FUNDING

J. Paul Hamilton, Title XX Contract Officer
Pennsylvania Department of Welfare
Office for the Visually Handicapped
Pittsburgh, Pennsylvania

By way of clarification, let me quickly review for you the history and background of the Title XX Program.

In 1967, Congress enacted amendments to the Social Security Act to provide social services to the aged, blind and disabled. These amendments were known as Title I and, therefore, can be considered as the forerunner to Title XX as we now know it. Then, in late 1971 or early 1972, additional amendments were enacted and Title I evolved into Title VI. During this period, programs such as aging, day care, legal assistance, etc., developed services utilizing part or in whole Title VI monies. Finally, in 1975 Congress again enacted yet more amendments and as a result of the Mondale amendments, Title VI became the Title XX program superseding Title VI.

Basically, Title XX is a program based on need. The mere fact that a person is aged, blind or disabled, entitles you to nothing. A need for the requested service must be established, predicated upon existing Federal-State regulations.

In addition, Title XX is a match program. The present formula provides for a 75 per cent Federal match against a 25 per cent non-Federal match. In Pennsylvania, our 25 per cent non-Federal match for Title XX programs to the visually handicapped is made up by a 19.5 per cent State appropriation and 5.5 per cent local monies.

Also, in Pennsylvania we also have currently 20 Title XX contracts providing services to the visually handicapped. Of this number, three of the contracts provide radio reading services. The total value of the 20 contracts is \$1,497,000. I consider this quite an accomplishment for the Commonwealth of Pennsylvania, considering three short years ago we had no Title VI services for the visually handicapped, and the budget was a zero figure.

When planning to seek Title XX funds for your radio reading service, I believe that it is essential that you obtain and familiarize yourself with three documents. They are the Federal Title XX Regulations, CFR-45, Chapter 2, Part 228; your State's current comprehensive annual service program plan (CASP) and your State's Title XX fiscal budget.

When studying CFR-45, Part 228, you will immediately see the Title XX programs have definite limitations and restrictions; however, don't let this discourage you from pursuing

Title XX funding. Yes, there are certain restrictions and recording procedures mandated by the Federal regulations, but some areas such as eligibility requirements, service categories, etc., are subject to State options.

For example, regarding fiscal eligibility, HEW establishes financial eligibility based on 115 per cent of the national median income; however, a State may opt a lower percentage. The Commonwealth of Pennsylvania has elected 80 per cent of median income for individuals over age 60 and 65 per cent for those under age 60. As you can readily see, this creates a dual financial eligibility standard for radio reading services. As a result of public hearings and meetings with consumers and providers, we are in the process of amending our financial eligibility requirements to an 80 per cent across the board. CFR-45, Part 228, has provisions for such an amendment process. Using the 65 per cent test, individuals may have a monthly income up to \$408.00. With the 80 per cent tests across the board, the monthly allowable income will be \$502. As you can see with the increase of nearly \$100 per month in allowable monthly income, our reading audience will be increased. So I say to you, do not hesitate to seek amendment to your present State comprehensive annual service program plan in the event the present regulations cause undue hardship.

Another option your State may or may not elect is group eligibility as opposed to individual eligibility. This, only you can determine after evaluating the income level of your radio listening audience. It may be such that it is to your advantage to request this available option.

I also suggest that you should obtain a copy of your State's Title XX fiscal budget. By studying this document, you can determine where and to what services your State is appropriating its Title XX monies. Perhaps you may find that there is a sum of money not yet appropriated or perhaps you might decide to approach existing programs such as the aged or disabled, in order to secure funding. Whatever the case may be, do not ignore this source of funding solely because your program is relatively new and small and you hesitate to enter the arena, competing with the established so-called "giants" of the Title XX program. After all, where would we be today if David when viewing Goliath for the first time had taken this approach.

Finally, I would like to remind you who have received Revenue Sharing Funds for the establishment and operation of your radio reading service, that it will soon be permissible to use Revenue Sharing money as your 25 per cent non-Federal match for Title XX. In so doing, you can greatly increase the total amount of funding available to you. So, I say to you, Title XX funding by itself or in concert with other funding sources can be an excellent funding source. Do not overlook it when seeking available funding sources.

VOCATIONAL REHABILITATION SERVICES

Mrs. Margaret Vernon
SCA Coordinator
KPBS-FM San Diego State University
San Diego, California

In July of 1976, the Radio Reading Service For The Print-Handicapped was awarded a Facilities Improvement grant (or FIG) from the Department of Health, Education and Welfare through the California State Department of Rehabilitation in the amount of \$89,838 with a match of \$9,982 required - a total of \$99,820. It is a 3 year grant - renewable yearly.

I have been asked to share our experiences in securing those monies, what we are doing with them and our future plans for funding when these grant monies are depleted.

Let me begin by outlining the budget within the grant. The lion's share is encumbered for receivers - a total of \$34,472 and personnel. The reasons are obvious - no listeners, no reason for project; no staff, no programs. We did not request funds for use of the sub-channel because our public radio station is willing to absorb those costs until such time as we are financially solid. Then, of course, we included supplies, communication, travel, reproduction costs. Each state seems to be unique in their budget restrictions but these are always clearly outlined in the proposal guidelines. At any rate the granting agencies will tell you these budget restrictions are "clearly" outlined.

Now, let us talk about how the grant was secured. Very early in the game we recognized the urgency of securing a major grant to see us through our growth period. By the way, we initiated our radio reading service on August 1, 1975 with the grand total of 21 receivers distributed - you can see we had some growing to do. Our early efforts included appeals to community service organizations to donate funds to purchase receivers. They responded quite willingly and have to date donated over \$30,000. We anticipate continued support from this source for several years to come.

As a result of last year's conference in Minnesota we returned with an approach for funds through our state Rehab Department. I want to thank the people from Ohio for sharing their approach for fund seeking - in fact we utilized their proposal extensively. I hope that we too can share with those of you

considering a similiar proposal. We contacted the Rehab Department and suggested to them that we had a media and an audience that appeared to be tailor made for special rehabilitation programming complimentary and supplementary to their services. After much discussion they agreed but with one very obvious difference - the programs would have to be designed to serve all physically disabled people. They challenged us to prepare a proposal that would be beneficial to this expanded potential audience.

Quite frankly it was with a great deal of trepidation and reservation we addressed the task at hand. There were many who felt concern about diluting the radio reading service and feared the interests of the two audiences would not "jell." Needless to say we proceeded with caution. Briefly the kinds of programs we projected were (1) current information on various aspects of living as a physically disabled, blind or visually handicapped person; (2) presentation of courses for credit to those unable to attend classes on campus for reasons of mobility; (3) afford talk show exchanges between the listeners and between those agencies concerned with the disabled and the listeners; (4) provide air time for those organizations of and for disabled groups. Simple enough. When award was made, we said "Good Grief! Did we really say we could do those things?" Additionally, the proposal emphasized two facts that I feel sold the proposal (1) the potential audience in San Diego County rose from 5,000 to 110,000 people. Those were published figures supplied by the California Rehabilitation Department; (2) our service is the only service of its kind in the state and is considered a model project.

Once award is made the job has just begun. Our successes speak for themselves. However, I feel there is equal value in failures - let me share those. Initially we made 2 critical errors (1) we hired a rehab counselor to design the programs and (2) we approached those agencies serving the disabled to prepare programming they felt would be of interest to the listeners. After 2 months of wondering "What's wrong?" and "where are all the new listeners" we discovered that the new programs were BORING, TRADITIONAL and totally UNCREATIVE. When we finally caught a glimpse of the forest and the trees we took a new approach. We first cancelled all the programming on this new project called Radio Access For The Disabled and announced we would be back in two weeks with a new direction and a new format. We replaced the rehab counselor with two people - one was a recognized leader in the disabled community and most importantly was a sounding board of the people; the other had been right under our nose - a blind engineer trainee

who had exhibited incredible talent for on-air broadcasts. These two energetic people were assigned the task of designing programs to meet the needs of the disabled audience as expressed by the disabled audience. We then re-approached the agencies with "This is what the audience wants, can you respond." The result of these steps has been well worth the effort. Our audience is really beginning to grow and our programs reflect the dictates of those it serves. Presently, we broadcast 12 hours of reading daily and 2 hours of special programs daily. Both the visually and the physically disabled audience have been responsive.

A third portion of the grant devotes a good deal of energy to evaluation from the viewpoint of the audience. I urge any of you considering such a project to place a high priority on this effort.

Grant renewal is upon us. When I left San Diego, I left a skeleton staff scurrying about to put the renewal proposal in final form. We have been advised that the program design and letters of support, both from the community and from the audience, will receive close scrutiny and how will we continue when grant funds are depleted?

Like many of you, we do charge an annual subscription fee for the service - that's important not for the receiver rental but for the programming costs. I assure you, however, that no one is refused service if they are financially unable to pay. Looking at a potential audience of 110,000 people (that of course is unrealistic but even 10% of that figure represents a tremendous audience) we can look toward the day of self support. In the meantime, we will continue to solicit the support of community service organizations, private foundations, individuals and local, state and federal government grants.

As a sidenote, 2 years ago California legislation created the California Public Broadcast Commission. We are currently preparing a proposal to be submitted by the California Association of Public Radio Stations to create an interconnect for a statewide SCA system. We are quite hopeful this Commission will be responsive to this proposal. If this should occur then quite logically additional funding will follow.

The grant I have described is only one avenue to follow for funding. Securing a grant doesn't solve all the problems - grants run out. What we have to address ourselves to is the long range plan - I hope each of you will and have shared those ideas during this conference.

A PREPARED PAPER ADAPTED FROM A TALK GIVEN BY DR. MARGARET W. ROCKWELL,
DIRECTOR OF THE WASHINGTON EAR, INC., AT THE THIRD ANNUAL CONFERENCE OF RADIO
READING SERVICES IN BETHESDA, MARYLAND ON MARCH 16, 1977

INTRODUCTION

Private philanthropy is an extremely broad topic encompassing many areas, any one of which could be the subject of an entire paper. The materials which follow are an overview of the important areas of concern for those who are charged with the responsibility of raising funds for a radio reading service. Since no one area is covered in great detail, the remarks are necessarily general and may be more applicable to those who are relatively inexperienced in fund raising. They are based upon the writer's experiences in raising money to establish and maintain The Washington Ear over the past four years. It may be useful for the reader to be able to place Washington Ear's fund raising efforts in the proper context. The local political jurisdictions in the Greater Washington area support the day to day operating expenses, and private philanthropy is used to finance the purchase of the SCA receivers and other projects not considered to be a legitimate part of our basic operating costs. One of the major foundations in the Washington area has been responsible for financing 50% of the cost of each and every receiver issued to date. The remainder of the cost of the receivers which have been distributed and other special projects and equipment have been provided for through a myriad of other sources which will be dealt with in this paper.

This paper is divided into the following five areas:

- I. Identification of Funding Sources and Other Contacts
- II. The Written Proposal
- III. Public Speaking and Person to Person Contacts
- IV. Putting On Your Own Fund Raising Events
- V. Follow-up

I. Identification of Funding Sources and Other Contacts

A. Foundations

Most metropolitan areas have a "Foundation Center" or, if not, perhaps some library which will carry reference materials that you should thoroughly investigate. These materials will include a comprehensive list of all foundations within the area, both large and small. A well written reference work will include information on the foundation's special area or areas of interest, the total assets of the foundation, the amount of their average grants, names of previous recipients of grants, and the dates for filing grant proposals. The areas of interest for a foundation which could include the work being done by radio reading services include health, rehabilitation, education, communications, library work, blindness, recreation and social services. When it comes time to write the pro--

posal, you should of course tailor it to fit, wherever possible, the area or areas of interest stated by the foundation in question. Even if foundations located out of your immediate area have a history of contributing in areas which fit in with your service, it is generally a waste of time to apply for a grant unless you have a personal contact which might have some influence upon their decision. Otherwise your service will be seen as a purely local endeavor and you would improve your chances of success by concentrating on foundations who are interested in helping those who reside within the range of your service.

B. Service Clubs

Lions Club, Kiwanis, Rotary, Junior Chamber of Commerce, Knights of Columbus and other groups have established local chapters throughout the country. They are good sources for continuing support although the results will be uneven and it will take time to build up response to your needs. It is not possible to locate the individual chapters in the telephone directory but you will be able to locate a regional office, district governor or his counterpart. Through this contact you attempt to disseminate your literature to the various chapters and let it be known that a representative from your service would be available to address meetings throughout the area. The Lions are, of course, noted for their interest in work for the blind, but do not be surprised if they are not too supportive at first. Each chapter for all of the service clubs is relatively autonomous, and they are only very loosely linked together. If the district governor or his counterpart is not interested in your work and has pet projects of his own, this will influence many of the local chapters.

Civic groups, local clubs and charitable organizations and religious groups can also be helpful. Some will be listed in the phone book, and knowledge of the existence of others will depend upon your knowledge of the area and contacts through your staff and volunteers.

C. Corporate Contributions

Again, check the telephone directory or the directory of the Chamber of Commerce, if you can obtain it, for the names of prominent corporations in your area who may be persuaded to contribute to your work. The Telephone Company, itself, is an excellent source since, through their work with the Telephone Pioneers, they have become sensitive to the needs of the blind. In general, contributions will not exceed \$500 since larger amounts would be funneled through a separate foundation under the aegis of the corporation, or would have to be justified to their stockholders. You should always check with a public relations or information officer of the corporation to determine if the corporation is inclined to give to a service for the blind. If the corporation has specific interests which do not bear any relation to your work, you are wasting your time to apply. The only thing you can hope to accomplish in such a case is to inform their personnel office of the availability of your service, so that employees or relatives of employees, who could benefit from a receiver would know of your existence. You may also recruit new volunteers through this contact. Incidentally, we have often received contributions from employees of a large corporation at Christmas time because

they knew of someone who used our service and they believed in our work. However, one cannot apply for this type of assistance.

C. Smaller Businesses

Since the economy is very tight and most smaller businesses are not presently prospering, you cannot hope to derive much support from this source. Indeed, many small businesses feel that they have already been approached by too many causes and it is possible that you or one of the representatives from your service may even encounter hostility no matter how courteous your request may be. There are exceptions of course. If you or your volunteers have personal contacts, you may be able to succeed where otherwise you would have failed. Another route to take is asking the business to purchase an advertisement for a fund raising event or otherwise participate in the event in a manner which will enhance the image of the business in the eyes of the community. In other words, if they feel they have something to gain for themselves rather than making a direct contribution, they are more likely to help.

D. Volunteers

Aside from the obvious contributions which your volunteers make to your service in donating their time and labor, each and every volunteer is also a potential contact to some corporation, foundation, service club and so on. It is wise to develop opportunities to get to know your volunteers not only to make better use of their skills and talents for your service, but also to learn how they may be able to help in other ways. Some will step forth and offer the information without this contact, but often you can only learn about these possibilities by mixing with them since what you may see as an opportunity, since you are more experienced in fund raising, would not independently occur to the volunteer. In addition, through volunteer contacts, you may be able to acquire both equipment and services which you need either free or at very reduced cost. This is also considered to be an important part of private philanthropy. Finally some of your volunteers will make contributions to the service, or remember the service in their wills. However, it is our policy at Washington Ear never to approach volunteers for contributions unless we are selling tickets to a fund raising event. We feel that they are already giving of their time and if they wish to contribute beyond this it should be strictly voluntary.

E. Hospitals and Nursing Homes

You may have extended your service into local hospitals and nursing homes. This not only benefits more people who need the service, but can also be viewed as a useful tool in the area of public relations in your community. In addition, you can derive some income from these sources, since, although many of these institutions are also non-profit organizations, they are generally able to contribute something to your service. With rare exceptions, Washington Ear requires these institutions to reimburse us for the cost of the equipment we provide. We also request an annual contribution either

from the institution itself or from some auxiliary group which raises funds to benefit the hospital or nursing home in question. Some of the nursing homes are profit making institutions and should help to support a service which their patients use. Most hospitals have a Ladies' Guild, Doctor's League or similar organization which, if they are informed of your needs, will be willing to assist.

F. Listeners

A modest but steadily increasing source of income is available from your listeners. Washington Ear offers both its service and equipment without charge, but contributions are encouraged and a provision for this is made on our application form. Approximately 50% agree to help us, and the average contribution is \$15 a year though there are some who can afford and do give more. We have discovered that sending out reminders to our listeners when their contribution is due has markedly increased the amount we receive. However, the wording of these reminders must be very carefully thought out or some of the listeners will misunderstand and feel that they are receiving a bill.

G. The Junior League

The Junior League has exhibited an interest in radio reading services and/or work for the blind in many parts of the country. The policy of the League is not to merely release funds to an organization, but to support an organization with both financial assistance and volunteers. The League will help to finance equipment, including receivers, or certain special projects which could otherwise not be undertaken. Even if the League will only agree to supply you with volunteers, this arrangement has several advantages. To begin with, they will designate one of the volunteers as a coordinator who will be responsible for the supervision of her volunteers. If you have projects which require the cooperation of several volunteers to carry it off, this can be very helpful since your staff would be relieved of some of the coordinating responsibilities which necessarily arise when you are attempting to pull together a group of volunteers who have never worked together before. Most of the League volunteers have above average educational backgrounds and many have contacts in the community which can be of significance to your service. Through these contacts the work done by your service will become better known to a segment of society which is certainly in a position to be supportive if it chooses. In a later section of this paper the writer will discuss participation of the League in a major fund raiser for our service.

H. Continuing Support

It takes staff time and a certain amount of money to initiate any contacts which will lead to financial assistance. Therefore, whenever possible, you should try to develop sources of continuing sup-

port which can be more or less depended upon when you are estimating your annual income. If you have any control over the situation at all, it can be wiser to aim for a more modest contribution which would be repeated annually rather than a larger one which would only come your way on a single occasion. Service clubs and various organizations would fall into this category. Foundations cannot be depended upon to continue with their support, though some will.

II. The Written Proposal

A. General Comments

Most of your appeals for money will have to be put into writing even if it only involves a short and simple letter. Many feel that the task of undertaking a written proposal is an arduous one, and it can indeed be time consuming, but there are ways which will be discussed in this section to make your work easier. Lengthy proposals should not be submitted unless you have some reasonable hope of success, since, if your staff and financial resources are limited, writing a large number of proposals which fail to yield any income will only divert your time and attention from other approaches which could bring positive results. Shorter proposals are a different matter especially if you have developed a packet of general enclosures which can be quickly assembled with a relatively short narrative tailored to meet the requirements of the foundation in question.

B. Packet of Materials for Enclosures

Many of the items listed below are not only important for fund raising purposes, but for public relations as well. They can tell the story of your organization and can set the style and tone of the way your organization is run. If you are not satisfied with the present versions of your written materials, it would be well worth your time and what money you can spare to improve them.

1. A Small Descriptive Pamphlet

You should have a short, catchy, attractive pamphlet which gives basic background information about your service geared to the reader who has little or no information about your work and even less time to become informed in detail. If the pamphlet is lavishly gotten up it could give the impression that you either do not really need help or that you are managing your money unwisely.

2. Monthly Program Schedule

A monthly program schedule well laid out to give the reader quick and easy access to the amount and kinds of programs you transmit is of course the most important you can offer since that's what your service is all about. If the program titles and the information are too cryptic to be of much help to those who are not well acquainted with your service, you should reconsider your format. From the reactions we have received from people who receive our materials, the program schedule is the one most important source which makes people aware of the scope of our service.

3. Alphabetical Index of Publications which are read

An alphabetical listing of all newspapers and magazines which are regularly read cross-referenced to the time of day, day of week and date of month when it can be heard, is an important adjunct to your

monthly program guide. Our index also includes an alphabetical listing of special interest areas such as music, science and so on for the convenience of the reader. It is a dramatic and impressive way of demonstrating the wide array of print materials and other options you offer to your listeners.

4. Reprints of Press Articles

If the newspapers in your area have printed a significant article describing your service, particularly one which is accompanied by a photograph, you should have the article reproduced by a printer qualified to do such work and distribute it with your other materials. Your pamphlet and program schedule reflect you and how you tell your own story. The article which appeared in the paper shows that your service was newsworthy and it also reflects the attitudes of others towards your service.

5. Budget Materials

Many foundations require that you send a copy of your current budget and your proposed budget for the next fiscal year if it has been drawn up. Some will request your financial statements for the past three to five years. You should have the services of a CPA, and your budget and financial reports should be clear and in order or you will create an impression of instability and irresponsibility.

6. Letters From Listeners

A couple of well written letters of appreciation from your listeners can be a nice addition to your packet of materials. We do not always include them but probably should more than we do.

7. List of Services Throughout The Country

The list of other similar services throughout the country strengthens your position within your own community. When materials are developed by the newly formed Association of Radio Reading Services they will doubtless have a similar effect.

8. The Longer Report

It might be advantageous to write a more comprehensive report which describes your work, its philosophy, your organizational structure and so on in more detail to meet the requirements of certain funding sources which are not satisfied with less. It is not requested frequently, but if it has not been prepared in advance it can be highly inconvenient to come up with it upon demand. It is not recommended that you distribute such a report indiscriminately since it can be expensive and would not be appreciated, but it definitely has its uses.

C. Matters of Style

Everyone will adopt his own style in preparing proposals, but there are a few general suggestions which you may find helpful if you have not already thought about them.

1. The Cover Letter

Use good quality bond paper for your cover letter and be sure that all appeals for financial assistance are individually and neatly typed. The letter should address itself to the specific interests of the foundation or organization and briefly state your need for applying for help. If the foundation or organization has helped you in the past, this should of course be mentioned with appreciation. Re-

quests for help should not leave your office without some cover letter or note specifically addressed to the person or organization for whom it is intended. This requires extra time, but without this courtesy your appeal may automatically be discarded.

2. Brevity

Foundations and organizations receive far too many requests for help each year and must read through these materials. Make your proposal as short as possible while fulfilling the stated requirements of the particular foundation or organization. A concise well written proposal will be outstanding because they probably receive all too few of these, and you have therefore increased the probabilities in your favor.

3. Meet Your Deadlines

Be sure to find out well in advance when the proposal is due and then have it in on time. Even if the foundation only will permit you to file a few days late, and many will not, it would create a much better impression if you did not ask for this concession.

4. Tone of Narrative Materials

It is important for your materials to convey the tremendous impact of your service upon the lives of people who need it so that those who could help will be motivated to do so. However, there are many good and worthy causes and it is possible to go too far with purely emotional materials. You must also be able to demonstrate how many people need help, how it is a truly cost effective means of providing a vital service to the handicapped and how you can either establish such a service or continue to provide it to your community. Generally the reason for providing a radio reading service to those who cannot read for themselves is readily understood, and it is not necessary to document the obvious at great length.

III. Public Speaking and Person to Person Contact

A. The Speakers' Bureau

If at all possible you should attempt to locate qualified people who could help you in establishing a speakers' bureau which could represent your service to various organizations and groups in your area. It will not be practical for any one person to assume the responsibility for taking on all speaking engagements. Your speakers should be extremely well versed concerning the function, structure, and philosophy of your service, and they should be thoroughly prepared to answer the typical questions which will arise after a presentation has been delivered. If you send someone out who has been poorly prepared, you will damage the image of your service and reduce the chances of receiving any support from the group which was exposed to your less than adequate representative. Often the bad impression will not be confined to one group since the members of the audience have friends and contacts in other organizations and frequently many people belong to more than one organization. Other things being equal, a highly articulate personable handicapped person is the best possible spokesman for your service since such an individual is in a position to eloquently point out the meaning that a radio reading service has in the lives of those who must depend upon it. Do not make the mistake of lowering your standards for a representative from your service just because the person is handicapped or you will compromise

the well being of your organization. Frequently the ink flows on checks not only because a group was impressed with the work done by your service but also because they liked or were impressed with the speaker who delivered the message. If your service has trained enough speakers to meet a number of requests from various groups in your community, you may wish to send out letters to prospective organizations announcing the availability of your speakers, giving brief information about the topic and length of the talk, and asking them to consider your service when they are setting up their programs for their meetings.

B. The Presentation

The secret of any good presentation is advance preparation with attention to details and a good strong delivery. An outline which covers the important ideas you wish to convey should be written and then this outline can be "fleshed out" and adapted to the particular audience to be addressed when the occasion arises. A simple straight forward presentation is always the best approach. It is best to assume that your audience will have little or no knowledge of SCA receivers, sub-carrier channels, the special needs of your listeners who are unable to read print materials or readily learn through simple observation, the existence of similar services in other parts of the country and so on. Although the audience is generally impressed with the service as a whole, the reading of the daily newspapers, descriptions of political cartoons, shopping ads and the comics always have a special appeal. The speaker should try to make the audience identify with the needs of the listeners and how the service can change their lives by using commonplace every day examples which would make each man or woman in the audience better understand what it might be like to be handicapped and how a radio reading service could help if it ever happened to them. If the speaker is handicapped, he or she should avoid comments concerned with the philosophy of work for the blind and its shortcomings, the attitudes of the sighted towards the blind and other related topics. The attention of an audience can only be sustained for a limited period of time and it is highly adviseable to concentrate all one's efforts on the task of informing the assembled group about the merits of a radio reading service and the need for their help.

Below are some suggestions which may be helpful to you when you are preparing to respond to a request for a speaker.

1. The speaker should always take one of the receivers to demonstrate, but should be sure to check for adequate reception before demonstrating the set. If reception is poor, pass the set around the room and let people examine it, but do not plug it in.
2. A supply of program schedules, pamphlets and other materials should be taken with the speaker and left on a convenient table rather than distributed to everyone present. Those who are truly interested will take the materials and the rest can be saved to use for another time.
3. Unless it is specifically requested, the talk should not be longer than twenty minutes allowing approximately ten minutes for the question and answer period. Beyond this amount of time the attention span of audience begins to wander and restlessness sets in. It is considered a cardinal

sin to talk longer than your allotted time during a luncheon meeting since many present will have appointments to keep back in their offices afterwards.

4. Slides or photographs can be an excellent addition to your presentation if they are done well.

C. When People Visit Your Studios

Sometimes representatives from a foundation or organization will wish to visit your studios. When this occurs it might be well to consider the appearance of your offices and studios and what kind of an impression it will make. A general atmosphere of order, cleanliness and attractiveness will be a positive reflection of good management and increase your chances of receiving the assistance you have asked for. Most radio reading services cannot afford lavish interior decorating. This is probably just as well since it could definitely give your visitors the notion that your service does not truly need help. If you are able to schedule the visit during a time when volunteers are reading the daily newspaper or otherwise engaged in some interesting project this could be advantageous. It is extremely important for you to begin and end the appointment on schedule.

D. Visits to the Offices of a Foundation, Corporation or other Organization

When you are asked to visit the office of a possible funding source, try to arrange to have one of your volunteers or one of your more articulate consumers accompany you. Their presence will generally stimulate questions and remarks which would not have occurred if you had gone alone. A receiver should always be brought along, but in this case there will be no opportunity to check for good reception in advance of your demonstration. Perhaps we have been unusually fortunate, but generally the reception has been at least adequate, and if there have been problems, the people have been sophisticated enough to readily understand that reception is not always reliable in a large office building. Again, it is extremely important to begin and end your appointment on time.

IV. Putting On Your Own Fund Raising Events

There are many ingenious ways of staging fund raising events which will encourage people to spend money on your service while they are having a good time. In most cases the money you receive through these events is money which would never have come your way via a direct contribution. Fund raising events are also valuable because they usually generate some publicity for your service in the community. The type of fund raising event which would be appropriate for your service at any given point in time will depend upon the volunteers you have to work with, your financial resources and contacts in the community, and the styles and customs which are prevalent and popular in your region of the country. This section will not attempt to describe the various kinds of events which your service could put on, but it will attempt to point out factors which are applicable to the subject in general.

A. If you are a novice at putting on such events, it would be wise to begin with something more modest before undertaking something on an elaborate scale. It's always best to have success on a small scale rather than a conspicuous failure.

B. Before you invest in your time and the time of your volunteers, be sure that the expected returns from the event will be worth the investment. This is particularly true for your volunteers who will only have but so much time and energy to devote to your service within any given period of time.

- C. If you are able to stage a fund raiser on a more sophisticated level, it can be enormously advantageous to your service. One of the Junior League volunteers assumed the responsibility for chairing such an event for The Washington Ear. The invitation list included names which we could not have used without their help since they were literally unknown to us. It gave us an entree to a level of society which often cannot be successfully approached without appropriate contacts. Even if the invitations were not accepted, they had value in spreading the word about our work to everyone on the invitation list. The event itself should be carefully planned to insure that those present will find it an enjoyable experience which they would wish to repeat another year and encourage their friends to come as well. In this manner, year by year, you may be able to make your fund raiser one of the social events in your community and derive an ever increasing yield as a result of your efforts. This year The Washington Ear put on a roast of one of the leading television personalities in our area. The roasters included prominent media people, newspaper writers and politicians. The roast was followed by music for dancing, free flowing champagne, and a brunch to top off the evening. Our service netted over \$5000 from this one event.
- D. Keep a thorough and meticulous file of all invitations sent and the responses you received. This will help you in future years to remove names which are not responsive thus reducing your printing and mailing costs. This list combined with the list of all contributors could be used as a basis for a direct mail appeal since it would more than likely give you a high return for your investment. In general, lists which can be purchased for direct mail appeals do not yield any income for at least three to five years and during that period of time your costs can be extremely high. Our service has not had the resources to make such an investment, and it is doubtful if it would ever be considered.

V. Follow-Up

Since continuing support is vital to the well being of your service, the transaction is by no means complete when the check arrives in the mail. The following suggestions may be of help to you in securing additional support from those who have already contributed to your service.

- A. Organize a complete file of all contributors according to category: for example-foundations, service clubs etc. and the month during which the last contribution was made. The following year, month by month, these contributions can be approached.
- B. When you make your approach the following year you should not only express your appreciation for help received in the past, but you should also include a brief progress report on your service and enclose any recent press clippings. Some organizations prefer to make a contribution for a specific piece of equipment or project. If you know this to be the case then your appeal for help will be strengthened by enumerating some of your current needs. This generally is not difficult to accomplish.
- C. Always send acknowledgements promptly for a contribution of any size. These letters should be individually typed. You may feel that the amount is small, but it may represent a real sacrifice for the person who gave it, and it may also open other doors for you in the community.

CONCLUSION

The work being done by radio reading services meets a need in the lives of our handicapped listeners which can be readily understood by potential contributors. This works in our favor. However, there are many other organizations involved in offering various types of service to the community which also have a legitimate claim on the same sources we may approach. Therefore it is not sufficient that our cause is worthy to insure that we receive the help we need and deserve. You should not think in terms of financial institutions giving to a radio reading service. This is too abstract. You should instead think in terms of people giving to people since funds are released far more often on this basis than they are for merely a cause. If you adopt this as your philosophy then you will use every possible opportunity to meet your potential benefactors, or convey a warmth and graciousness over the telephone and in your written communications which will encourage them to want to assist you. It means that you will make time available to conduct tours of your studios, converse with club members on the phone and appear at many meetings when it is not totally convenient and you have other matters to attend to waiting on your desk. The challenge of securing funds through private philanthropy is an unending one, and the degree of success you will have will in part depend upon the reputation which you and your staff and representatives create for yourselves in your community. The writer is not implying that this reputation can cover a multitude of sins if your service is poor, but it can make a significant difference in the results you may derive from your efforts.

REVENUE SHARING

Stanley Doran
Executive Director
CORRS
Columbus, Ohio

I'm pleased to be attending a National Radio Reading Service Convention for the third time. Two years ago I attended the First National Meeting in Oklahoma City where I saw an example of the service for the first time and heard the experiences of many other broadcasters. I learned from the convention last year in Minneapolis and this year I picked up a lot of informative notes about what other stations are doing.

I'd like to speak particularly to those who are starting a brand new service because that's where I think Revenue Sharing can play a very important part. On March 4th, two years ago, our newspaper carried an article saying that the assistant to Mayor Moody, Jerry Gafferd, had returned from a trip to Washington, D.C. where he had investigated further uses of revenue sharing funds. Revenue Sharing was still relatively new having started in December, 1972. Revenue Sharing is the return of some federally collected money to municipalities on the basis of population and taxed income. It could clearly be used to support fire departments, police departments, sanitation departments, and other civic functions. The Mayor questioned whether the funds could be used to improve the community through work with handicapped persons and elderly persons. It was found that specific clauses in the law allowed the money to be used for health, also poor and elderly persons. (Since January 1, 1977 restrictions have been removed and the funds may be used at the discretion of the Mayor and City Council.)

Independently of that and three months earlier, December 1975, Ohio State Rehabilitation Services Commission had called many of us together to discuss the possibility of bringing Radio Reading Services to Ohio. I was a member of an ad hoc committee that met in January and February. On March 4, when the article appeared in the paper, I went to see the Mayor and he generously wrote a letter naming me as one of the representatives of the city to the First National Conference in Oklahoma City.

I returned from that conference with added knowledge of the needs and of the techniques for establishing a Radio Reading Service. After further discussions with the Mayor's representative, we saw a need to incorporate a Radio Reading Service separate from the other agencies in Ohio's capital city. I

was joined in the incorporation by Fred Allemeier and Irwin Hott, two excellent technicians who had been attending the State Radio Reading Service Committee Meetings.

WOSU-FM had also made an independent study of the use of it's sub-carrier for Radio Reading Services. They assisted us in determining the cost of good studio equipment. With their help, we turned in a request to the City Council for \$200,000 of Revenue Sharing Funds with which to rent the space, purchase the equipment, construct five broadcasting rooms and four offices, and employ a staff of five for one year.

At about the same time we, as members of the State Committee, were applying for an Innovation and Expansion Grant through the Rehabilitation Services Commission of Ohio. That request was granted, providing enough money for Cleveland to get started plus funds for extra receivers for the Central Ohio Radio Reading Service. When we found that we would not need that many extra receivers some funds were released so that services could be started in Youngstown and Kent, Ohio.

One of the joyful messages I bring to you who are starting Radio Reading Services is that Federal Revenue Sharing Funds may be used as matching funds for other Federal Grants. Most money obtained through federal sources cannot be used for other federal grants. This is not considered to be Federal money since it is collected from the community and returned to the community. It can be used as matching money for federal grants and it can be used entirely by itself to start a Radio Reading Service. How it is used depends upon your Mayor and City Council. Yesterday, I called the United States Treasury to verify some of these facts. I urge you to do so.

Your problem is to prove to the City that they want to include you in as they cut up the pie. The money has been spent in past years without you being a part of it. It's up to you to prove that there are valid reasons for wanting your services in that City.

One reason might be that you can serve handicapped and elderly persons in a radius of fifty miles. Your city fathers may be interested in a service that serves not only blind and elderly persons in your community but in the surrounding municipalities.

In our case, we had consulted with WOSU technicians and had determined that the cost of purchasing good equipment, insulation, studio construction within the space we had rented, charges for air time, and employment of staff for a year would

cost \$200,000.00. Our request for those funds was flatly refused. We were told to turn in a request for half that amount. We did, after considerable struggle, but we also did our first lobbying. We developed a single sheet showing the March 4th article, indicating that the money could be used for Radio Reading Services and that there were \$200,000.00 available for community services. In a typed article below the newspaper copy, we showed that a sighted person receiving both major papers paid \$96.00 per year. We showed that we could establish the station, purchase all of the equipment, and still serve our number of listeners for less than \$96.00 each per year. Incidentally we are serving the people this year for \$76.00 each. They are able to read from three major downtown papers, nine area papers, and fourteen magazines.

After circulating this paper to the City Treasury, the Finance Director, and a variety of other city offices, we were called to Jerry Gafferd's office to talk about the project. We went taking friends with us including Betty Willson, Head of the Talking Book Placement Program in Ohio, and representatives from WOSU-FM who were ready to testify that the funds in the \$100,000 budget were not really adequate for starting a substantial station. We didn't have to debate the point during the meeting. Mr. Gafferd spoke only of the figures in the \$200,000 budget and ended by saying the Mayor would support the appeal to City Council. The request was granted in June, the money flow started in August, we started construction in September, finished in October, got on the air in November. I'm proud of this record because I believe we put the majority of our funds to actual use benefiting our listeners.

Revenue Sharing is attractive because it can be used for total financing of a new service or for matching funds with other grants. Your Mayor and City Council can see that funds brought in from outside sources can benefit a large number of handicapped persons in your community. They can also create a new business with new jobs.

I want to point out some of the things we do besides reading the papers and magazines. We have three host interview programs per day. Each of our hosts are blind. Each interview program is phone-in so that the listeners can ask their own questions. We broadcast the Homemakers show in the morning, the VIP show at noon, and the Hobby Hour in the evening. Listeners may call in and say, "I don't separate the whites from the yolks of the eggs that way, I do it this way," or they may say "I found that it's more practical to use a power saw this way." There are

many elderly persons who are not near a phone and do not phone in but we find that they enjoy the questions of those who phone in regularly and seem to become part of the cast. We have special shows on Saturday on Homemaking, Economics, Gardening, and Sports. We have an active group of consumers who are volunteer staff members and we have an active consumer's advisory committee plus a majority of consumers on the Board.

I want to mention something here that I've not heard mentioned in the rest of the conference. We consider our service to be a center of community activity as well as a radio station. We are a center of activity for those who are bedfast and the home-bound as well as for those who are active handicapped persons. As such we have planned several ice-skating parties, roller-skating parties, a euchre party where the learning of the game was emphasized, a trip to see the Reds play in Cincinnati, and a trip to Kings Island. In all of our activities the volunteers have joined with the listeners. Last Christmas time we formed a caroling group and went to many of the rest homes where our listeners stay and caroled in the area where many of our teachers at the Ohio State School for the Blind live. Our oldest retired teacher is 102 years of age.

There is a value to the people who can take part in these activities, but there is another value for the people who are home-bound or bedfast. We talk about the activity before it happens. We make recordings of the activity when it's appropriate and create a program that everyone enjoys. We talk about it after it's happened. Our listeners who can not travel with us enjoy vicariously the activities which are reported.

COORS was built and funded for the first year by Federal Revenue Sharing funds. At the end of the year there were about 10,000.00 unspent dollars, which we were able to use as matching funds for an innovation and expansion grant through Ohio Rehabilitation Services Commission. This illustrates the two uses of Revenue Sharing Funds. It can be used to put a station on the air and it can be used as matching funds for other federal dollars. Tell your Mayor that one dollar of Federal Revenue Sharing funds can bring in three dollars of Title XX or Federal Matching funds to establish a service for handicapped persons in your community.

Thank you very much for your attention.

Questions and Answers:

Question: Was it necessary for you to become a line item in the budget?

Answer: We were not a line item in the budget. We were a one time thing.

Question: In San Francisco we will be covering more than one city, are there any specific problems I should avoid?

Answer: We dealt with this problem when we incorporated and called the organization The Central Ohio Radio Reading Service rather than the Columbus Radio Reading Service. We showed Mayor Moody that we would be serving handicapped persons within a fifty mile radius and while he was primarily concerned with handicapped persons in Columbus, he realized that the majority of handicapped persons did live in that area but without extra cost we were able to serve the people in the wider area. When he saw these statistics he was more than pleased to support us on the basis of Central Ohio with Columbus being the center of 100 mile diameter of service.

Question: Do you ask a donation from your listeners?

Answer: We do ask a donation of \$15.00 annually from those listeners who are able to support the service in this way. In fact, the receivers are given to everyone free and it is up to them whether or not they can make a donation. We have about 1,100 receivers placed and this year have only received a little more than \$6,000, in donations from our listeners. Most of our listeners are older persons and they are on fixed incomes or social security payments.

Question: What happened when your grant ran out?

Answer: We understood that the support of the Mayor and City Council was for one year to enable the station to be built and begin operation. At the end of that year we still had \$10,000 left from our original grant. As I have said we were able to use it to obtain Federal Matching Funds. I should say also that our consumers organized a walk-along. Eighty-four walkers raised \$9,000 which was also applied towards the Rehabilitation Services Commission Grant of Federal Matching Funds. Our budget this present year is \$84,000 of which we had to raise 30%.

Question: Would it be possible to ask the Mayors of more than one city to participate in this project?

Answer: I believe so. If you can show the Mayors of more than one city that their residents are going to benefit by your service, I believe they would share the expenses. The funds are returned by the federal government for the Mayors and the cities to spend. In the case of benefit to handicapped persons in several municipalities, I expect that the municipalities could share the cost of establishing a station in one of them.

Question: On the fact that you have been supported by the city, do you have any programs such as "talk with the Mayor" or "talks with your city council people" about the problems that are undoubtedly present in Columbus as they are everywhere else? For example, transportation, or the problem of going into a voting booth and having people tell you that you can't take a friend in with you or that you ought to vote in such and such a way. Do you have any regular program for interviewing such people?

Answer: The VIP program is our interview of very important persons for us who are "visually impaired people." Yes, our Mayor has come down to see the station and talk to us. The Lt. Governor has visited us and some of the members of city council have come. Through these contacts we have gotten some specific problems solved. One of our listeners in particular was pleased because they had had street problems near her home for many months. On the day we interviewed Fran Ryan, a council woman, she brought the problem to Fran's attention and the next day people were working on the street to solve the problem. When stories like that circulate among our listeners they feel that their chance to talk to politicians through this method really pays off. We do not have a continuous program talking to the Mayor. That is done on a commercial radio station. We have three host programs per day and a variety of guests appear on those programs and are interviewed by the hosts and our listeners who phone in. We feel that this continual flow of information helps remove the handicapped person from a feeling of isolation and makes him know that public officials

are indeed responsive to his needs.

Question: Since you have been supported by the Mayor, does the Mayor have a receiver in his office?

Answer: Yes. We have placed a receiver on a demonstration basis in the Mayor's office. When the program was established he asked for the receiver in the hopes that he might listen to the morning newspaper articles while working at his desk. Later, when I asked him about it he said that listening and working at the same time didn't work out too well. He did listen to our programming from time to time because he enjoyed knowing that handicapped persons in our community were being benefited in this manner. We have also loaned receivers to persons in advance of their appearing on our host programs. The demonstration receivers allow their family members or people in their offices to hear their interview and incidentally to understand the purpose of Central Ohio Radio Reading Service.

Thank you very much.

ADMINISTRATION OF RADIO READING SERVICE STATIONS

Richard Estell
Manager
WKAR Radio
Michigan State University
East Lansing, Michigan

The Estell workshop on "Administration of Radio Reading Services" devoted much of the time in both sessions to the discussion of the qualifications required for an administrator of Radio Reading Services for the Blind and Physically Handicapped. The participants arrived at the following minimum qualifications:

Dedication - The applicant must have a commitment to service to the blind and physically handicapped. Administration of such services is more than "just another job".

Volunteer Experience - Previous work with and relationships to volunteers was generally agreed upon as a requirement.

Fund-raising Experience - Because the majority of Radio Reading Services throughout the country are supported through gifts, grants, and donations, and future services of this kind will undoubtedly require funding from the same sources, this qualification is a necessity.

Awareness of Broadcasting - Without radio there would be no Radio Reading Services; but it was felt by the participants that the RRS administrator needs no more than a general understanding of broadcast rules and regulations and station policy in order to fulfill the requirements of the position.

Knowledge of the Consumer - Whereas knowledge of broadcasting could logically be attained through consultation with radio station management, the participants agreed that knowledge of the consumer required a much deeper involvement in order to better understand the consumers' problems, needs, and desires.

Administrative Experience - This is an all-encompassing qualification which includes some knowledge of budgeting and bookkeeping, hiring and firing, organization and public relations.

Willingness to Learn - A "catch-all" which really means: Can the applicant walk on water.

The second session went further in pursuing the "job description" of an RRS administrator by discussing salary ranges for such a position. A quick poll of those administrators

in attendance revealed the present range to be \$8,000 - \$13,500.

No one was able to state with assuredness where such individuals were to be found today, and it was generally agreed that some relaxation of the job requirements would be necessary in order to "get on with the task at hand".

There was some discussion concerning the makeup of governing boards and advisory councils. No perfect combination of individuals was found, but the consensus of the group suggested that it would be advisable to have some combination of consumers, blind and physically handicapped agency reps, broadcast liaison with the station broadcasting the service, and representation from community groups, service clubs, business, industry, education, etc.

Another major discussion item related to the advantages and disadvantages of broadcasting Radio Reading Services through the facilities of commercial as opposed to non-commercial radio stations. One participant stated that insofar as payment to the station was concerned, there was little difference...public stations are seemingly charging as much (in some cases more) than their commercial counterparts. A significant point was made during this exploration: A commercial radio station is eminently more inclined to discontinue the Radio Reading Service on his SCA if a more lucrative service is offered; while a non-commercial station sees such programming to the blind and physically handicapped as fulfilling the public station philosophy of offering "alternative services" to all the people. In other words, the public station is on the air to serve the people while the commercial station is on the air to make a profit. There is greater potential for dedicated service to the blind through public radio.

This discussion prompted yet another concern: Matching grants for SCA receivers are available through the new H.E.W. Educational Broadcasting Facilities program. However, such grants seemingly are not available to those reading services which employ a commercial radio station to broadcast their programming. Following discussion, it was agreed that Estell would contact Mr. Matthew Coffey, President of the Association of Public Broadcast Stations and request recommendations and/or assistance in seeking a solution to this problem. This information will then be forwarded to the President of A.R.R.S. for whatever action is called for.

In concluding the second and final session of the afternoon, Mr. Harry King of "Dialogue" made a special presentation, "The Dialogue Award of the Year" to Mr. Stanley Doran, Executive Director, CORRS, Columbus, Ohio.

REPORT OF PANEL ON FEDERAL REGULATIONS

Chairperson, Cheryl A. Strange
Radio Special Projects Manager
Corporation for Public Broadcasting
Washington, D.C.

Discussant, Mary Dinota
Educational Broadcasting Facilities Program
Department of Health, Education and Welfare

Cheryl Strange opened the workshop with an overview of FCC regulations and copyright legislation affecting radio reading services. It was noted that data would focus on radio reading services on the subchannel of noncommercial stations, as the main channel services were not subject to any special regulations.

FCC Regulations. Subsidiary Communications Authorization (SCA) is granted by the FCC to the licensee of an FM radio station, which must maintain responsibility for SCA transmissions. The licensee files a one-page application (FCC Form 318, Request for Subsidiary Communications Authorization) specifying the purpose of the SCA.

In addition to obtaining authorization, if the radio reading service proposes to read grocery and sales information from newspapers, the licensee must request a waiver of the FCC's rules prohibiting commercial messages on noncommercial stations. In response to a number of questions, radio reading services were advised that the waiver permits reading of advertisements as information; promotion of particular products and services is not permitted. Services may not transmit any advertisements for cigarettes or little cigars.

Copyright. Exemptions for radio reading services under the revised copyright law (PL94-553) which takes effect January 1, 1978 were reviewed:

Section 110 (Limitations on exclusive rights: Exemption of certain performances and displays):

(8) performance of a nondramatic literary work, by or in the course of a transmission specifically designed for and primarily directed to blind or other handicapped persons who are unable to read normal printed material as a result of

their handicap, or deaf or other handicapped persons who are unable to hear the aural signals accompanying a transmission of visual signals, if the performance is made without any purpose of direct or indirect commercial advantage and its transmission is made through the facilities of: (i) a governmental body; or (ii) a noncommercial educational broadcast station (as defined in section 397 of title 47); or (iii) a radio subcarrier authorization (as defined in 47 CFR 73.293-73.295 and 73.593-73.595); or (iv) a cable system (as defined in section 111 (f)).

(9) performance on a single occasion of a dramatic literary work published at least ten years before the date of the performance, by or in the course of a transmission specifically designed for and primarily directed to blind or other handicapped persons who are unable to read normal printed material as a result of their handicap, if the performance is made without any purpose of direct or indirect commercial advantage and its transmission is made through the facilities of a radio subcarrier authorization referred to in clause

(8) (iii), PROVIDED, That the provisions of this clause shall not be applicable to more than one performance of the same work by the same performers or under the auspices of the same organization.

Section 112 (Limitations on exclusive rights: Ephemeral recordings):

(d) Notwithstanding the provisions of section 106, it is not an infringement of copyright for a governmental body or other nonprofit organization entitled to transmit a performance of a work under section 110 (8) to make no more than ten copies or phonorecords embodying the performance, or to permit the use of any such copy or phonorecord by any governmental body or nonprofit organization entitled to transmit a performance of a work under section 110 (8), if--

(1) any such copy or phonorecord is retained and used solely by the organization that made it, or by a governmental body or nonprofit organization entitled to transmit a performance of a work under section 110 (8), and no further copies or phonorecords are reproduced from it; and

(2) any such copy or phonorecord is used solely for transmissions authorized under section 110 (8), or for purposes of archival preservation or security; and

(3) the governmental body or nonprofit organization permitting any use of any such copy or phonorecord by any governmental body or nonprofit organization under this subsection does not make any charge for such use.

Underwriting. Radio reading services were advised that costs of producing and transmitting SCA programming may be underwritten. Services were advised to consult the main channel manager for assistance in crediting underwriters, which is subject to FCC regulation. Services were also advised to consult station managers concerning any regulatory question.

The second part of the workshop was devoted to the Federal matching grant program for purchase of equipment. Ms. Mary Dinota, of the Educational Broadcasting Facilities Program, Office of Education, Department of Health, Education, and Welfare, explained application procedures for that grant program. The EBFP provides up to 75% matching funds to licensees of noncommercial radio and television stations for equipment. Radio reading services may apply through the licensee for equipment, including SCA receivers. Applications may be submitted at any time; applications not approved in one grant year may be re-activated the following year.

In response to several questions about ownership of SCA receivers purchased through an EBFP grant, Ms. Dinota said that the receivers must remain on the licensee's inventory for a period of ten years; EBFP regulations require this ten year interest.

PROGRAMMING IDEAS

Ms. Ethel W. Lutin
Coordinator
Volunteers Readers Services
WPLN Talking Library
Nashville, Tennessee

The base of all programming for radio reading services depends on two factors - the hours of operation and the condition of being an open or closed circuit channel. An assessment of the listening audience can be determined by the questions posed on the application for service form. Other consumer research techniques, such as telephone interviewing, are helpful in determining which programs are being heard, who is listening, and which hours are prime time programming.

Frequent airing of the station's telephone number and requests for feedback are helpful. Changing programming slots generally produce calls of inquiry. All this, in toto, forms a picture of the needs of the listening audience.

The reading of newspapers constitutes the basic program. Newspapers should be selected to give a balanced point of view. The techniques employed in reading should reflect as matter-of-fact a delivery as possible. Our goal is to give the listener information on which he can make his own judgments. To this end a mixture of neighborhood, city, state and national newspapers are used. The papers are read for two hours each morning, two hours each evening and for three hours on Sunday afternoon. Since it's impossible to cover a complete newspaper in this period of time, editing, for the time factor only, is necessary. Stories can be cut without sacrificing basic information and should be cut to allow greater coverage of the newspaper. Editorials, letters to the editor, grocery ads and retail store sales may be read only if a waiver has been granted by the Federal Communications Commission.

Listeners realize that volunteers are doing the reading and they learn to accept a certain amount of informality. The reader introduces himself and speaks directly to the listener on a person-to-person basis. He may comment on the weather or speak with the other readers on a first name basis. There is no attempt to cover up paper noises, bloopers or misprints in the paper. However, newspaper reading is the only place this kind of informality is allowed. Periodicals and books are read on tape with no divergence from the printed word.

Periodicals are selected to reflect a wide variety of ages and tastes and are scheduled at definite times in the calendar, so that if you want to read TIME magazine, you must listen at a certain time on a certain day. There can

be no attempt to read an entire magazine because of time limitations. The selections of articles to be read from each magazine is done by a staff member and the volunteer jointly. This is to assure coverage of a great variety of topics along with an assurance of better delivery, since the reader is interested in that particular story.

Books are read at the same time each day until the completion of the text. Kirkus Review, Publishers Weekly, The New York Times Book Review Section, The New York Review of Books, local newspaper book reviews and suggestions from listeners and volunteers are all taken into account in selecting books for possible airing. The Regional Library for the Blind and Physically Handicapped is contacted for clearance so that there is no duplication. Our staff person meets with the Book Selection Committee of the Public Library system and a broad spectrum of books for all ages and tastes is selected. The books are then assigned to different people to preview and a Preview Sheet filled out for each one. This indicates the locale, the characters, foreign names, obscenities, and general recommendations for accepting or rejecting the book for airing. This sheet also acts as a cue for assignments to volunteers. We try to match the interests of the reader so that he can relate to the book.

When a reader accepts an assignment of a particular book, he commits himself to turning in three hourly tapes each week. We keep one voice on each book because we feel the reader can better interpret each character if he is familiar with the total script. Our tapes are timed to 58 minutes for each segment and an introduction and sign-off for each reel is furnished to the reader.

In processing the books for retention or replay, we fill out four catalogue cards for each one listed by author, title, shelf number and the name of the reader. In addition, we fill out a copyright clearance for the Regional Library for the Blind and Physically Handicapped so that they will be informed about which books we are airing and so that they can duplicate the book and circulate it throughout the state if they wish. About 19 - 20 books are completed each month.

Most books are read in volunteers' homes. We have more than 40 Sony 105 recorders available for home use. To qualify for this program, a volunteer must pass an audition test and participate in workshops of instruction in the use of the equipment. He then submits a pilot tape recorded in his own home. This tape is evaluated by the volunteer coordinator and the engineer to check on the quality of sound and the effectiveness of the reading. If the pilot tape is good, a book assignment is made and tapes exchanged by mail.

The best programming is based on the effective use of your own community resources. Newsletters and journals from service agencies concerned with the handicapped and aging or interviews with local people working in these agencies are a fine source of information. Such groups would include the American Foundation for the Blind, the Council for Exceptional Children, the American Association of Retired Persons, the National Retired Teachers Association, senior citizen groups, the state and local Services for the Blind departments, the American Council of the Blind, the National Federation of the Blind, the American Association of Workers for the Blind, paraplegic groups, muscular dystrophy associations, multiple sclerosis groups, cerebral palsy groups, the Special Education departments of the local school system and the state, the School for the Blind, university and medical school staffs, the State White House Conference and others. The community is also the resource from which you draw your readers. Personnel of local radio and television stations, small theatre groups, speech departments of colleges and universities, retired people, alumni associations of sororities and fraternities, churches and libraries offer a nucleus of possible volunteer readers.

The local community calendar not only informs the sedentary listener about what is going on, but also encourages him to participate. The parks programs, the university calendar, the shopping news, the job market conditions, legal aid tips, consumer affairs, income tax information, state legislative affairs, special holiday material, reviews of upcoming books, movies and T.V. shows, interviews with legislators, authors, and people in decision-making positions all offer a base upon which programming can be built.

Special local talent can be utilized. Authors may enjoy being asked to read their books. State archives and historical associations are a fine source of local history. In some instances, volunteer readers have developed their own weekly programs of information.

In addition to all these sources, your listeners offer an untapped avenue of consumer participation. Hints on adjustments made in everyday living offered by a well-adjusted blind person to the newly-blinded person are very helpful. Learning to cope with blindness and physical disability in daily life is an experience which is gradual and on-going. Blind people can serve as an advisory council and a valuable source of feedback about programming from the rest of the consumer public. Good listeners can serve on audition committees to evaluate reading on pilot tapes or audition tapes. Your consumers are also a source of questions to the experts on call-in shows or may be experts themselves to certain programs.

A very real test of your programming is the face-to-face meeting of volunteer readers and their listeners. This

personal relationship between reader and listener is very evident and serves as a real reward for the volunteer. If this confrontation can be done on a yearly basis, it can strengthen your program.

Evaluation is the last step of your programming. On-going consumer telephone interviewing can be helpful only up to a point. If it is done by a staff member, you are limited to regular office hours and you cannot reach those people who listen only in the evening. Sometimes answers are given which the listener feels the station wants to hear - "to be polite". There is difficulty getting reactions from sets placed in nursing homes or other communal facilities. The use of blind or physically handicapped questioners calling at other hours and asking the same interview questions would be helpful. All telephone calls and letters should be listed and tallied. If you really want response, wait until something happens to the transformer and you are off the air. Your listeners will want to know whether it's their sets or your transmission. That's a sure sign they are listening.

REPORT ON PANEL ON CONSUMERISM

William F. Gallagher, Chairman
Director, Program Planning Department
American Foundation for the Blind

The Panel of Consumerism had a lively discussion. The following persons participated: Chairman William Gallagher, AFB, New York; Jim Jones, New York; Jim McGinnis, San Francisco; and Bill Ollila, South Dakota.

Consumers or listeners are the reason for the existence of Radio Reading Services; therefore, meeting their needs should be upmost in service delivery. Consumers can provide valuable input into programming. Much of this is presently being done by using questionnaires and other research devices. Follow-up, telephone calls, and questionnaires are made after placement of the receiver in the listener's home in order to insure usage and proper operation of the set.

Many changes in the service can be made or implemented with a minimum of hassle. Many programming suggestions have come from the listening audience. Consumers can have a great deal of involvement in Radio Reading Services by providing much direct assistance. Volunteers are used in several existing services quite extensively. They are used in such areas as interviewing, telephone answering, and typing.

Many services attempt to employ qualified blind persons on their staff. Listener Advisory Councils have been formed in order to review programming offered by the service. At least one Consumer Committee gets on the air so everyone can listen into the deliberations. Time, then, is provided for listeners to telephone in and give their comments. Other Radio Services have Listener Advisory Committees with a liaison person from the Board of Directors. Most Committees have a method for rotation of the membership. Some Boards appoint their own members while others select from those nominated.

Some Radio Reading Services totally review all their programming each six months. Of course, an ongoing review is made continuously. Some organizational barriers to consumer input were discussed:

A. Crushing Commitment - commitment by the agency beyond their abilities and resources

B. Teleological Preoccupation - is exclusive preoccupation with the ends to which the agency is committed; that is, the human needs are ignored

C. Righteous & Deafened - the agency is righteous and deaf to divergent views which are contrary to its own, and finally

D. Superman Syndrome - that is, the expectancy of a superman's performance by a technically, qualified individual who heads up the agency

It can be seen if any of these characteristics exist, consumer involvement will be reduced. Much agreement was evident in that the content of programming should include material which is timely and not readily available to blind persons or other handicapped people in other forms. It is evident that more than one programming format can be successful and attention must be given to local needs. Changes will take place in programming over time as the Radio Reading Services and their listeners become more sophisticated and familiar with the services.

SUMMARY OF REMARKS OF
STANLEY S. NEUSTADT

MARCH 17, 1977

The Subsidiary Communications Authorization (SCA) which almost exclusively provides the vehicle for the provision of radio reading services for the handicapped is a creation, at least in legal concept, of the Federal Communications Commission. The Authorization for the provision of subsidiary services of this general nature is an adjunct to the broadcast license issued by the FCC for the operation of an FM broadcast station, either commercial or noncommercial. It is probably accurate to state that the most basic legal requirements, considerations and policies which govern and affect the use of the SCA are those promulgated by the FCC, by formal rule or by announced policy. It is important, therefore, before turning to pertinent legal considerations which derive from other sources, to understand the basic legal nature of the SCA and the FCC rules and policies which govern its operation.

FCC RULES REGARDING THE SCA, AS SUCH

The SCA rules for commercial FM stations are Sections 73.293, 73.294 and 73.295 of the FCC Rules and Regulations. The analogous rules for noncommercial FM stations are Sections 73.593, 73.594 and 73.595.

These rules provide that an SCA may be granted only to the licensee (or permittee) of an FM broadcast station. In applying for a SCA, the licensee must specify the particular nature and purpose of the use to which it will be put, and it must also supply certain technical data concerning the manner in which it will operate. The purposes for which an SCA will be granted are limited to those which "are of a broadcast nature, but which are of interest primarily limited to segments of the public wishing to subscribe thereto." Another entire area of permissible use, of no concern here, is for the transmission of signals directly related to the operation of the FM broadcast station itself. As I will discuss more fully below, the definition of the permissible uses for an SCA creates a sort of paradox, because at least from the FCC's point of view it is critically significant whether SCA service is or is not "broadcasting." The noncommercial SCA rules are essentially the same as those for commercial stations, with one important difference: Programs which are transmitted must be noncommercial and in furtherance of an educational purpose, and the examples cited by the Commission state that the SCA may not be used for non-instructional

services customarily provided by commercial firms. Charges may be made to subscribers for the services provided only under limited circumstances set forth in the Rules.

The SCA rules expressly state that the SCA is an adjunct to the basic broadcast license, and cannot exist without it. The sub-channel may operate only at the same time as the FM station is providing programming on its main channel. The Rules further describe the applications which must be filed to inaugurate SCA service or to change the nature of the service provided, require that leasing arrangements for a sub-channel be reduced to writing and kept available by the station for inspection, and they describe the requirements for program logs and operating logs for the SCA. Of great importance is the requirement set forth in the Rules that the licensee of the broadcast station "must retain control over all material transmitted over the station's facilities, with the right to reject any material which it deems inappropriate or undesirable."

A copy of the pertinent rules is attached to this summary.

SCA OPERATIONS ARE NOT CONSIDERED TO BE "BROADCASTING"
FOR THE PURPOSES OF MOST FCC RULES AND POLICIES

It is of critical importance in the day-to-day operation of an SCA service whether it is considered to be "broadcasting" or not. You are all aware of numerous FCC regulations and policy which apply to normal broadcast material which, if they were applicable to your type of SCA operation, would create manifold concerns and problems on a day-to-day basis. I will try to discuss those policies in some detail, but a genuine understanding of the FCC attitude in this regard requires some knowledge of the historical and legal background from which the SCA arose.

In the early 1950's, FM broadcast stations by and large were doing very badly economically and in terms of listener acceptance. In order to provide additional revenue for commercial FM broadcast stations, many of them, with the blessing of the FCC, started to provide subscriber services over their main broadcast channels. These services, usually referred to as functional music or storecasting, utilized tones which were not audible, either to mute the subscriber's receiver so that it would not hear commercial announcements and other spoken matter in the case of functional music, or to increase the volume of specified commercials and comparable announcements in the case of storecasting. When the technology of multiplexing developed, which permitted transmissions over a sub-channel without significantly degrading transmissions

over the main channel, the Commission decided that all subscription services should be provided over a sub-channel, and it attempted to prohibit the use of non-audible tones on the main channel. It did this by ruling that subscription services did not constitute "broadcasting", and consequently could not be presented over the broadcast channel.

This ruling of the FCC was challenged in court, and in a leading case, Functional Music, Inc. v. FCC, the court ruled that the Commission had erred and that simplex (main channel) subscription services were broadcasting. On remand, the Commission nevertheless adhered to its SCA rules which require that FM subscription services be provided only over sub-channels and not over the main broadcast channel. Those stations which were providing simplex subscription service continued to do so for a short while, but for many years now all subscription services have been provided through SCA operation.

The FCC has adopted the position that SCA subscription services are not "broadcasting"; its position about simplex subscription services is not entirely clear, but is no longer of significance, since subscription services are no longer provided over the main channel of any FM station. Because SCA operations are not considered to be "broadcasting", the Commission has ruled that many of the requirements of the Communications Act and its rules and policies which apply to "broadcasting" do not apply to SCA operation. Another important result of the fact that SCA operation is not "broadcasting", but is considered a point-to-point communication, is that Section 605 of the Communications Act (the wiretap section) is applicable to SCA operations. This prevents the pirating of SCA signals by persons who are not subscribers. The unauthorized reception of SCA transmissions constitutes a crime under Section 605, and this view has been upheld by lower Federal courts.

POLITICAL BROADCASTING AND THE FAIRNESS DOCTRINE

The FCC has had occasion to consider the applicability of its rules and policies to the use of SCA's in Radio Reading Service programs. Attached to this summary is a copy of an FCC ruling on such a program in the D.C. area. It holds that neither the political broadcasting equal opportunity requirements of the Communications Act nor the Commission's Fairness Doctrine are applicable to this type of SCA operation, because it is not "broadcasting". Section 315 of the Communications Act requires that if a candidate for public office uses the facilities of a broadcast station for any purpose whatsoever, other candidates for the same office are entitled to equal use of those facilities. Although use of the SCA facilities by a candidate would be unlikely unless a candidate were a

reader, in any event it would not present a problem in Radio Reading Service. It has been held by the FCC that you need not be concerned about it. The Fairness Doctrine presents other problems. It requires that if a point of view on a controversial matter of public importance is presented by a station, the station must make affirmative efforts also to present other responsible points of view on the same matter. Newspaper and magazine editorials, as well as some news stories and magazine articles do present positions to which the Fairness Doctrine would apply if they were broadcast. However, the Commission has ruled that it does not apply to any SCA operation, including Radio Reading Service. This ruling also extends to the one portion of the Fairness Doctrine which has been codified as an FCC rule, namely the Personal Attack and Political Editorializing Rule. This rule requires that if the integrity of a person or group is attacked, or if a station supports or opposes the candidacy of a political candidate, it must contact the person or group attacked or the other candidates and make provision for them to respond over its facilities. Again, this requirement does not apply to your operation. The Commission's ruling on these questions was issued in a tentative way. It stated that if problems should arise under the Fairness Doctrine in the actual operation of a Radio Reading Service, it would promptly review the entire matter, and its ruling clearly implies its belief that it could and would extend the applicability of the Fairness Doctrine to cover such SCA operation.

STATUTORY PROHIBITION AGAINST EDITORIALIZING BY NONCOMMERCIAL STATIONS

Section 399 of the Communications Act prohibits any noncommercial station from editorializing and from supporting or opposing the candidacy of any political candidate. The Commission has ruled because SCA operation is not broadcasting that this statutory requirement does not apply. This is of importance to you, as are the exemptions from the political broadcasting requirements and the Fairness Doctrine, because in dealing with the licensees of the stations whose facilities you will be utilizing you can assure them that your activities will not expose them to potential violation.

UNDERWRITING AND COMMERCIALISM

To the extent that the sub-channel of a commercial FM station is utilized for the Radio Reading Service, commercials may be transmitted. This means, of course, that any entity which provides financial or other support for the service may not only be mentioned during the course of the transmission, but its products or services may also be promoted. Charges may also be made to subscribers, and fees may be paid to the Radio Reading Service.

The situation is quite different when the sub-channel of a noncommercial FM station is utilized. Direct charges to subscribers may be made, but the fees must be paid to the station and not to the Radio Reading Service, unless the Service is conducted by a bona fide educational institution. In no event may the payments thus received exceed the approximate cost of conducting the operation.

In the case of noncommercial stations, the cost of producing and transmitting the Radio Reading Service may be underwritten by persons or entities other than the subscribers. In such event, the rules normally applicable to noncommercial broadcast stations would apply to the SCA operation. The name of the underwriter may be transmitted, but it is not permissible to mention or promote any product or service of the underwriter. Indeed, only the correct corporate or institutional name of the underwriter may be transmitted.

The prohibition against the transmission of commercials creates a problem in the reading of newspapers which contain advertisements. In order for such advertisements to be read, the prohibition against the presentation of commercials must be waived by the FCC. Since the advertisements are an important part of the newspaper reading, and since the newspaper advertisers do not compensate Radio Reading Service, the FCC has been, and I am sure will remain, willing to waive this prohibition for this purpose.

LEGAL LIMITATIONS NOT RELATED DIRECTLY TO FCC REGULATION

Obscenity, lotteries and fraud. Federal criminal statutes prohibit the transmission of "obscene, indecent or profane language," the advertisement of or information concerning any lottery, and the use of radio in any scheme or artifice to defraud. Although

the Commission does have rules implementing some of these and other criminal statutes, the policies contained in them are not creations of the FCC. They are not limited to "broadcasting" (although the statute concerning lotteries is couched in "broadcast" terms). Comparable prohibitions apply to newspapers and magazines, so that if material is read from a newspaper or magazine it is a reasonable, but not inevitable, conclusion that these provisions would not be violated. The statute which prohibits cigarette commercials is also applicable to radio, including SCA, although it is not applicable to newspaper advertising. When the Commission waives the prohibition against transmitting commercials over noncommercial SCA's, it cannot waive the cigarette advertisement prohibition. Consequently, cigarette ads may not be read under any circumstances.

The application of the "obscenity" statute in any given case may be quite difficult. This statute is limited in its effect by the First Amendment to the Constitution, so that language which in normal conversation might be considered indecent or profane as well as obscene, might very well be protected under the First Amendment.

Copyright. Much of the material which would be read over the SCA will be copyrighted, whether the basic source be newspapers, magazines or other printed materials. Commencing on January 1, 1978, the reading of most copyrighted material by the Radio Reading Service would not constitute an infringement of the copyright. The Congress has recently enacted a new copyright law, for the first time since very early in this century. The new law takes specific cognizance of the type of activity in which you engage. Section 110(8), a copy of which is attached to this summary, provides specifically that it is not an infringement of copyright to perform a nondramatic, literary work in the course of a transmission specifically designed for handicapped persons under the following conditions:

1. The performance must be made without any purpose of direct or indirect commercial advantage.
2. The performance must be made through the facilities of a noncommercial educational broadcast station or over a subcarrier of any broadcast station.

Even this specific grant of exemption from copyright infringement is not without questions, some of which will only be resolved with the passage of time. It seems clear, however, that reading newspapers, magazine articles, novels and short stories will be exempt under the new statute. Reading of a play would present other problems.

Until January 1, 1978, the prior copyright law still governs. Under it, an unauthorized public performance of a nondramatic literary work is an infringement of copyright only if the performance is "for profit". The cases interpreting this provision are numerous and difficult to reconcile. Suffice it to say that questions of potential copyright infringement may arise if fees are charged to subscribers to the Radio Reading Service or if the facilities of a commercial FM broadcast station are utilized. In such instances it would be well to have authorization from the newspaper, magazine or other copyright owner for the reading of the material over the SCA.

Right of privacy and defamation. It is possible that newspaper and magazine articles which might be read over the SCA would constitute a libel or an invasion of the right of privacy of an individual. The law governing these matters is complex and difficult, and could itself serve as the subject for a lengthy seminar. Newspapers and magazines, of course, are extremely sensitive to potential problems in these areas. However, reading a libelous statement over the SCA would constitute a separate publication of the libel even though it was a verbatim reading of a newspaper article. In instances where you have any question about whether defamatory material or unauthorized privacy invasion is involved, it would be well to check first with the source (newspaper or periodical) and, if questions still remain, either to consult counsel or seek a release from the person or group involved.

LOGGING

The responsibility for maintaining the very simple program and operating logs for SCA operation rests on the licensee of the FM station. The actual operator of the SCA has no legal responsibility in this connection. The logging requirements are set forth in full in the attached FCC Rules.

§ 73.294 Nature of the SCA.

(a) The SCA is of a subsidiary or secondary nature and shall not exist apart from the FM license or permit. No transfer or assignment of it shall be made separate from the FM broadcast license, and failure to transfer the SCA with the FM license renders the SCA void. Any assignment or transfer of an SCA shall, if desired, be requested as part of the main station's transfer or assignment application. The licensee or permittee must seek renewal of the SCA (on FCC Form 318) at the same time it applies for its renewal of FM license or permit; failure to renew the latter automatically terminates the SCA.

(b) The grant or renewal of an FM license or permit shall not be furthered or promoted by the proposed or past operation under an SCA; the licensee must establish that his broadcast operation is in the public interest wholly apart from the SCA activities. (Violation of rules applicable to the SCA operation would, of course, reflect on the licensee's qualifications to hold its broadcast license or permit.)

§ 73.295 Operation under Subsidiary Communications Authorizations.

(a) Operations conducted under a Subsidiary Communications Authorization (SCA) shall conform to the uses and purposes authorized by the Commission in granting the SCA application. Prior permission to engage in any new or additional activity must be obtained from the Commission pursuant to application therefor.

(b) Superaudible and subaudible tones and pulses may, when authorized by the Commission, be employed by SCA holders to activate and deactivate subscribers' multiplex receivers. The use of these or any other control techniques to delete main channel material is specifically forbidden.

(c) In all arrangements entered into with outside parties affecting SCA operation, the licensee or permittee must retain control over all material transmitted over the station's facilities, with the right to reject any material which it deems inappropriate or undesirable. Subchannel leasing agreements shall be reduced to writing, kept at the station, and made available for inspection upon request.

(d) The logging announcement, and other requirements imposed by §§ 73.282, 73.283, 73.284, 73.287, 73.289 and 73.1208 are not applicable to material transmitted on authorized subcarrier frequencies.

(e) To the extent that SCA circuits are used for the transmission of program material, each licensee or permittee shall maintain a daily program log in which a general description of the material transmitted shall be entered once during each broadcast day: *Provided, however*, That in the event of a change in the general description of the material transmitted, an entry shall be made in the SCA program log indicating the time of each such change and a description thereof.

(f) Each licensee or permittee shall maintain a daily operating log of SCA operation in which the following

entries shall be made (excluding subcarrier interruptions of five minutes or less):

- (1) Time subcarrier generator is turned on.
- (2) Time modulation is applied to subcarrier.
- (3) Time modulation is removed from subcarrier.
- (4) Time subcarrier generator is turned off.

(g) The frequency of each SCA subcarrier shall be measured as often as necessary to ensure that it is kept at all times within 500 Hz of the authorized frequency. However, in any event, the measurement shall be made at least once each calendar month with not more than 40 days expiring between successive measurements.

(h) Program and operating logs for SCA operation may be kept on special columns provided on the station's regular program and operating log sheets.

(i) Technical standards governing SCA operation (§ 73.319) shall be observed by all FM broadcast stations engaging in such operation.

to provide limited types of subsidiary services on a multiplex basis. Permissible uses must fall within one or both of the following categories:

(1) Transmission of programs which are of a broadcast nature, but which are of interest primarily to limited segments of the public wishing to subscribe thereto. Illustrative services include: background music; storecasting; detailed weather forecasting; special time signals; and other material of a broadcast nature expressly designed and intended for business, professional, educational, religious, trade, labor, agricultural or other groups engaged in any lawful activity.

(2) Transmission of signals which are directly related to the operation of FM broadcast stations; for example: relaying of broadcast material to other FM and standard broadcast stations; remote cuing and order circuits; remote control telemetering functions associated with authorized STL operation, and similar uses.

(b) An application for an SCA shall be submitted on FCC Form 318. An application for SCA shall specify the particular nature and purpose of the proposed use. If visual transmission of program material is contemplated (see § 73.310(c)), the application shall include certain technical information concerning the visual system, on which the Commission shall rely in issuing an SCA. If any significant change is subsequently made in the system, revised information shall be submitted. The technical information to be submitted is as follows:

(1) A full description of the visual transmission system.

(2) A block diagram of the system, as installed at the station, with all components, including filters, identified as to make and type. Response curves of all composite filters shall be furnished.

(3) The results of measurements which demonstrate that the subcarrier, when modulated by the visual signal, meets the requirements of § 73.319(e), and of such observations or measurements as may be necessary to show that signal components of appreciable strength are not produced outside of the band normally occupied by the FM station's emissions (see § 73.317(a)(12) and (13)). A description of the apparatus and techniques employed in these measurements and observations shall be furnished.

NOTE: Operation of an FM broadcast station to obtain the technical information necessary to support an application for an SCA for visual transmission shall be considered " * * * for experimental purposes in testing and maintaining apparatus * * *" and may be conducted without specific authorization from the Commission pursuant to § 73.262(a) of the rules. Tests may be conducted for this purpose during the period from 6 a.m. to midnight, with prior notification to the Commission and the Engineer in Charge of the radio district in which the station is located, subject to the provisions of § 73.262(b), (1), (2), and (3).

(c) SCA operations may be conducted without restriction as to time so long as the main channel is programmed simultaneously.

§ 73.293 Subsidiary Communications Authorizations.

(a) A FM broadcast licensee or permittee may apply for a Subsidiary Communications Authorization (SCA)

Permissible uses must fall within one or both of the following categories:

(1) Transmission of programs which are noncommercial and in furtherance of an educational purpose, and which are of a broadcast nature but of interest primarily to limited segments of the station's audience. Typical services may include: programs for presentation in classrooms; programs designed for specific professional groups, such as doctors, lawyers, and engineers; programs intended to serve the special needs and interests of the aged, the handicapped, particular social or ethnic groups, and for those in a specific trade or sharing a common interest or hobby; programs for individualized remedial or advanced learning needs; and any use permitted for a commercial FM station under § 73.293(a)(1), subject to the prohibition against commercial operation and the limitation as to purpose contained in this section and in § 73.503, such limitation especially including those non-instructional services customarily provided by commercial firms. Users permitted under this subparagraph will not be considered "commercial," when charges are made for the service rendered, under the circumstances and subject to the conditions set forth hereunder:

(i) A per-course, per-session, per-seminar, per-pupil or other appropriate fee is charged for formal or informal instructional material, presented by, with or for a bona fide educational institution. Payment of the fee shall be made to the noncommercial educational FM station or to the educational institution; such fee may include, in addition to the station expenses detailed in subdivision (iii), of this subparagraph, the usual tuition charged for similar material presented by other means.

(ii) A charge is made for a program or series of programs, informational or generally instructional in nature, intended to meet the special needs and interests of one or more of the groups the station is authorized to serve under its SCA. Payment of the charge shall be made to the noncommercial educational FM station.

(iii) Payments retained by the station shall total no more than the approximate cost of conducting the SCA operation (including purchase or lease of equipment, course material, personnel services, etc.) and the general overhead and operational costs attributable to such operation.

(iv) A noncommercial educational FM station offering program material subject to fee or other charge shall clearly indicate in any broadcast or printed solicitation to prospective enrollees whether the material falls into category subdivision (i) or (ii), of this subparagraph, so that informational and general educational materials are not represented as formal instructional or institutional credit programs.

(2) Transmission of signals which are directly related to the operation of FM broadcast stations; for example, relaying of broadcast material to other broadcast stations, remote cuing and order circuits,

§ 73.593 Subsidiary Communications Authorizations.

(a) A noncommercial educational FM broadcast licensee or permittee may apply for a Subsidiary Communications Authorization (SCA) to provide limited types of subsidiary service on a multiplex basis. Any use of SCA by such licensee or permittee must be consistent with the limitation on the purpose and operation of noncommercial educational FM stations contained in § 73.503: *Provided*, That uses permitted under this paragraph will not be considered "commercial" as long as no consideration for such use (other than the furnishing of the material transmitted and/or payment of line charges) is received by the licensee, directly or indirectly, and no commercial announcements or references are contained in the material transmitted under the SCA.

(Ed. 8/76)

remote control telemetering functions associated with authorized STL operation, and similar uses.

(b) An application for an SCA shall be submitted on FCC Form 318. An applicant for SCA shall specify the particular nature and purpose of the proposed use. If visual transmission of program material is contemplated (see § 73.310(c)), the application shall include certain technical information concerning the visual system, on which the Commission shall rely in issuing an SCA. If any significant change is subsequently made in the system, revised information shall be submitted. The technical information to be submitted is as follows:

(1) A full description of the visual transmission system.

(2) A block diagram of the system, as installed at the station, with all components, including filters, identified as to make and type. Response curves of all composite filters shall be furnished.

(3) The results of measurements which demonstrate that the subcarrier, when modulated by the visual signal, meets the requirements of § 73.319(e), and of such observations or measurements as may be necessary to show that signal components of appreciable strength are not produced outside of the band normally occupied by the FM station's emissions (see § 73.317(a) (12) and (13)). A description of the apparatus and techniques employed in these measurements and observations shall be furnished.

NOTE: Operation of an FM broadcast station to obtain the technical information necessary to support an application for an SCA for visual transmission shall be considered "• • • for experimental purposes in testing and maintaining apparatus • • •" and may be conducted without specific authorization from the Commission pursuant to § 73.262(a) of the rules. Tests may be conducted for this purpose during the period from 6 a.m. to midnight, with prior notification to the Commission and the Engineer in Charge of the radio district in which the station is located, subject to the provisions of § 73.562(b), (1), (2), and (3).

(c) SCA operations may be conducted without restriction as to time so long as the main channel is programmed simultaneously.

§ 73.594 Nature of the SCA.

(a) The SCA is of a subsidiary or secondary nature and shall not exist apart from the noncommercial educational FM license or permit. No transfer or assignment of it shall be made separate from the FM license or permit, and failure to transfer the SCA with the FM license renders the SCA void. Any assignment or transfer of an SCA shall, if desired, be requested as part of the main station's transfer or assignment application. The licensee or permittee must seek renewal of the SCA (on FCC Form 318) at the same time it applies for its renewal of noncommercial educational FM license; failure to renew the latter automatically terminates the SCA.

(b) The grant or renewal of a noncommercial educational FM license or permit will not be furthered or promoted by the proposed or past operation under an SCA; the licensee must establish that its

broadcast operation is in the public interest wholly apart from the SCA activities. (Violation of rules applicable to the SCA operation would, of course, reflect on the licensee's qualifications to hold its broadcast license or permit.)

§ 73.595 Operation under Subsidiary Communications Authorizations.

(a) Operations conducted under a Subsidiary Communications Authorization (SCA) shall conform to the uses and purposes authorized by the Commission in granting the SCA application. Prior permission to engage in any new or additional activity must be obtained from the Commission pursuant to application therefor.

(b) Superaudible and subaudible tones and pulses may, when authorized by the Commission, be employed by SCA holders to activate and deactivate subscribers' multiplex receivers. The use of these or any other control techniques to delete main channel material is specifically forbidden.

(c) In all arrangements entered into with outside parties affecting SCA operation, the licensee or permittee must retain control over all material transmitted over the station's facilities, with the right to reject any material which it deems inappropriate or undesirable. Subchannel leasing arrangements shall be reduced to writing, kept at the station, and made available for inspection upon request from the Commission.

(d) The logging, announcement, and other requirements imposed by §§ 73.582, 73.583, 73.584, 73.587, and 73.1208 are not applicable to material transmitted on authorized subcarrier frequencies.

(e) To the extent that SCA circuits are used for the transmission of program material, each licensee or permittee shall maintain a daily program log in which a general description of the material transmitted shall be entered once during each broadcast day: *Provided, however,* That in the event of a change in the general description of the material transmitted, an entry shall be made in the SCA program log indicating the time of each such change and a description thereof.

(f) Each licensee or permittee shall maintain a daily operating log of SCA operation in which the following entries shall be made (excluding subcarrier interruptions of five minutes or less):

- (1) Time subcarrier generator is turned on.
- (2) Time modulation is applied to subcarrier.
- (3) Time modulation is removed from subcarrier.
- (4) Time subcarrier generator is turned off.

(g) The frequency of each SCA subcarrier shall be measured as often as necessary to ensure that it is kept at all times within 500 Hz of the authorized frequency. In any event, however, SCA subcarrier frequencies shall be measured in accordance with the following schedule:

(1) For stations authorized to operate with transmitter power in excess of 10 watts, each SCA subcarrier frequency shall be measured at least once each calendar month with not more than 40 days expiring between successive measurements.

RULES AND REGULATIONS

(2) For stations authorized to operate with transmitter power of 10 watts or less, each SCA subcarrier frequency will be measured:

(i) When the SCA subcarrier generator is initially installed;

(ii) At any time the frequency determining elements of the SCA subcarrier generator are changed;

(iii) At any time the licensee may have reason to believe the SCA subcarrier frequency is not within the frequency tolerance prescribed by the Commission's rules.

(h) Program and operating logs for SCA operation may be kept on special columns provided on the station's regular program and operating log sheets.

(i) Technical standards governing SCA operation (§ 73.319) shall be observed by all FM broadcasting stations engaging in such operation.

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

FCC 74-1212
24946

November 6, 1974

IN REPLY REFER TO:

8300-G

Greater Washington Educational
Telecommunications Association, Inc.
Radio Station WETA-FM
5217 19th Road, North
Arlington, Virginia 22207

Gentlemen:

The Commission has considered your letter of September 20, 1974, and your supplementary letters of September 30 and October 1, 1974, in which you propose a program service authorized under WETA-FM's Subsidiary Communications Authorization (SCA) to serve the special needs and interests of the blind.

Your state that the proposed program service will in large measure consist of the reading from newspapers of lead stories, feature articles, editorials and advertisements. You request (a) a declaratory ruling as to the applicability of the fairness doctrine and Sections 315 and 399(a) of the Communications Act of 1934, as amended, to your SCA programming; and (b) a waiver of Sections 73.503(d) and 73.593(a) of the Commission's Rules with respect to your proposed service.

Applicability of Section 3(o) of the
Communications Act to SCA Service

In KMLA Broadcasting Corporation v. 20th Century Cigarette Vendors, et al., 264 F. Supp. 35 (C.D. Cal. 1967), a case involving unauthorized use of SCA transmissions of background music, the court held that SCA transmission of a program service does not constitute "broadcasting" within the meaning of Section 3(o) of the Communications Act, since SCA operation is not intended for the general public. In WFTL Broadcasting Company, 45 FCC 2d 1152, 1153-54 (1974) the Commission stated:

...while possessing some of the attributes of 'broadcasting' as defined in Section 3(o) of the Communications Act, transmissions carried by FM broadcasters on their authorized sub-carriers are, in common with the point-to-point services, protected from unauthorized interception and use under Section 605 of the Act. Functional Music Inc., v. FCC, 274 F. 2d 543 (1958); KMLA Broadcasting Corporation v. 20th Century Cigarette Vendors, et al., 264 F. Supp. 35 (1967).

Greater Washington Educational
Telecommunications Association, Inc.

Applicability of the Fairness Doctrine

The fairness doctrine, obligating licensees to afford reasonable opportunity for the discussion of conflicting views on controversial issues of public importance, would appear to be applicable only to broadcast facilities intended to serve the general public. See Applicability of the Fairness Doctrine in the Handling of Controversial Issues of Public Importance, 40 FCC 598 (1964). Although we view SCA program services as possessing some of the attributes of "broadcasting" as defined in Section 3(o) of the Act, the service is not received by the general public and therefore does not fall within the originally intended scope of the fairness doctrine. Accordingly, the Commission will not at this time extend the applicability of the doctrine to the highly specialized informational service for the blind which you propose.

However, should the plan in actual operation subsequently raise serious public interest questions related to the fairness doctrine, we will promptly review the entire matter.

Although a ruling was not specifically requested, we similarly hold inapplicable Section 73.598(a) of the Commission's Rules concerning personal attacks, in view of the nature of the service proposed and the limited audience reached. Should experience also subsequently reveal serious problems in this area, the Commission may choose to reexamine the entire question.

Applicability of Section 315 of the Communications Act

Section 315 of the Act provides:

(a) If any licensee shall permit any person who is a legally qualified candidate for any public office to use a broadcasting station, he shall afford equal opportunities to all other such candidates for that office in the use of such broadcasting station....

In view of our above ruling that SCA operation is not "broadcasting" within the meaning of the Act, the Commission concludes that Section 315 does not apply in the present case. Moreover, since by definition Section 315 is confined to the use of a broadcasting station by a candidate and you do not propose to permit candidates to use your SCA facilities, it appears that equal opportunities questions under Section 315 would not arise in any event.

Applicability of Section 399(a) of the Communications Act

Section 399(a) of the Act provides "No ^{non-}commercial educational broadcasting station may engage in editorializing or may support or oppose any candidate for public office." For the reasons stated above, the Commission concludes that Section 399(a) also does not apply.

Greater Washington Educational
Telecommunications Association, Inc.

The Commission in the past has interpreted the provisions of Section 399(a) as applying only to the expression of views on public issues either represented or intended as a presentation of the official views of the licensee. Letter of Accuracy In Media, Inc., Re WNET-TV, 45 FCC 2d 297 (1973). Since you propose to read editorials from selected newspapers in an informational context only, and do not propose to represent these editorials as your own views, Section 399(a) questions would not arise in any event.

Waiver of Sections 73.503(d) and 73.593(a)
of the Commission's Rules

Section 73.503(d) of the Rules prohibits educational FM stations from broadcasting "announcements promoting the sale of a product or service ... in connection with any program." Section 73.593(a) of the Rules provides that any educational SCA use intended to serve the special needs and interests of the handicapped and other similar groups "must be consistent with the limitation on the purpose and operation of noncommercial educational FM stations contained in §73.503: Provided, that uses under this paragraph will not be considered 'commercial' as long as ... no commercial announcements or references are contained in the material transmitted under the SCA."

The Commission has from time to time granted limited waivers of the provisions of Section 73.503(d) to permit the broadcast of old radio programs which include commercials. We have based these limited waivers upon the historical interest in old radio commercials, although we have, in another context, expressed concern as to commercial "clutter" on educational broadcast stations, Noncommercial Educational Stations, 26 FCC 2d 339, 342-3, 20 RR 2d 1602, 1607 (1970). The Commission concludes that a limited waiver of Sections 73.503(d) and 73.593(a) is appropriate in the present case, since your proposed service is consistent with the public interest, meeting a basic informational need of the blind that is not otherwise served. Further, a limited waiver would not violate the intent of our applicable rules by introducing significant commercial "clutter" to the educational broadcast spectrum, since the proposed service would not be received by the general public.

Although highly meritorious, the unique service you propose is nevertheless untested, and the Commission therefore views it as essentially experimental in nature. For this reason, we would like the opportunity of review after a one-year period to permit consideration, if necessary, of any presently unforeseen problems that might arise. Accordingly, Sections 73.503(d) and 73.593(a) are waived for a period of one year from the date of this letter.

Greater Washington Educational
Telecommunications Association, Inc.

Applicability of the Public Health Cigarette
Smoking Act of 1969, As Amended

You are reminded that Section 1335 of Title 15 of the United States Code, as amended, prohibits the advertising of cigarettes and little cigars on any medium of electronic communication subject to the jurisdiction of the Commission. The Commission has no authority to waive the provisions of that statute.

Commissioner Reid absent; Commissioner Hooks concurring and issuing a statement.

BY: DIRECTION OF THE COMMISSION

Attachment

Vincent J. Mullins
Secretary

cc: Counsel

In Re: Greater Washington Telecommunications Association, Inc.

I am well pleased with this proposal to use an FM subcarrier frequency, under a Subsidiary Communications Authority (SCA) license, for the constructive purpose of serving the blind. Although, quite frankly, SCA was originally established to provide struggling FM broadcasters with a supplementary source of income and a large percentage of stations leased these subchannels to background music operators, these frequencies can be used for other purposes. SCA could help alleviate the problem of insufficient minority involvement in the media and the Commission should strongly consider this promising opportunity.

As a matter of fact, inasmuch as SCA frequency use was created to provide a broadcast-like service to special interest recipients and in view of the fact that SCA operation is relatively inexpensive since it is an incremental adjunct to an operating FM station, SCA seems to be a provident vehicle for serving select audiences which may be too small to receive thorough attention by the mass media. This particular WETA proposal is to direct programming to the blind. It is my understanding that SCA has been used to serve foreign language audiences and I see no reason why this FM service cannot be used for other special interest minorities.

Since I perceive a broader potential for SCA than simply background music and am interested in observing its development with pithier programming, I am apprehensive about that aspect of our ruling which neglects to incorporate the protective mechanisms of Section 315 (political equal time) (47 U.S.C. §315) and the Fairness Doctrine. If, as in the present case, SCA is used as an alternative media with a more meaningful program content, then we may be hasty in permitting a situation in which controversies may arise without plugging in the regulatory machinery that precludes or resolves controversies. WETA assures us that its programming will be non-political and non-controversial. Hence, neither Section 315 nor the Fairness Doctrine would be involved anyway and, thus, would create no impediment. Therefore, I see no need to forego applicability unconditionally.

Because these new uses of SCA are in the nature of experiment--an experiment which I deem to be in the public interest--I will concur and await opportunity for empirical data on which to base my ultimate judgment on the wisdom of our exemptive policy with respect to Fairness and Section 315.

§ 110. Limitations on exclusive rights: Exemption of certain performances and displays 17 USC 110.

Notwithstanding the provisions of section 106, the following are not infringements of copyright:

(1) performance or display of a work by instructors or pupils in the course of face-to-face teaching activities of a nonprofit educational institution, in a classroom or similar place devoted to instruction, unless, in the case of a motion picture or other audiovisual work, the performance, or the display of individual images, is given by means of a copy that was not lawfully made under this title, and that the person responsible for the performance knew or had reason to believe was not lawfully made;

(2) performance of a nondramatic literary or musical work or display of a work, by or in the course of a transmission, if—

(A) the performance or display is a regular part of the systematic instructional activities of a governmental body or a nonprofit educational institution; and

(B) the performance or display is directly related and of material assistance to the teaching content of the transmission; and

(C) the transmission is made primarily for—

(i) reception in classrooms or similar places normally devoted to instruction, or

(ii) reception by persons to whom the transmission is directed because their disabilities or other special circumstances prevent their attendance in classrooms or similar places normally devoted to instruction, or

(iii) reception by officers or employees of governmental bodies as a part of their official duties or employment;

(3) performance of a nondramatic literary or musical work or of a dramatico-musical work of a religious nature, or display of a work, in the course of services at a place of worship or other religious assembly;

(4) performance of a nondramatic literary or musical work otherwise than in a transmission to the public, without any purpose of direct or indirect commercial advantage and without payment of any fee or other compensation for the performance to any of its performers, promoters, or organizers, if—

(A) there is no direct or indirect admission charge; or

(B) the proceeds, after deducting the reasonable costs of producing the performance, are used exclusively for educational, religious, or charitable purposes and not for private financial gain, except where the copyright owner has served notice of objection to the performance under the following conditions;

(i) the notice shall be in writing and signed by the copyright owner or such owner's duly authorized agent; and

(ii) the notice shall be served on the person responsible for the performance at least seven days before the date of the performance, and shall state the reasons for the objection; and

Notice of
objection to
performance.

Regulation

(iii) the notice shall comply, in form, content, and manner of service, with requirements that the Register of Copyrights shall prescribe by regulation;

(5) communication of a transmission embodying a performance or display of a work by the public reception of the transmission on a single receiving apparatus of a kind commonly used in private homes, unless—

(A) a direct charge is made to see or hear the transmission; or

(B) the transmission thus received is further transmitted to the public;

(6) performance of a nondramatic musical work by a governmental body or a nonprofit agricultural or horticultural organization, in the course of an annual agricultural or horticultural fair or exhibition conducted by such body or organization; the exemption provided by this clause shall extend to any liability for copyright infringement that would otherwise be imposed on such body or organization, under doctrines of vicarious liability or related infringement, for a performance by a concessionaire, business establishment, or other person at such fair or exhibition, but shall not excuse any such person from liability for the performance;

(7) performance of a nondramatic musical work by a vending establishment open to the public at large without any direct or indirect admission charge, where the sole purpose of the performance is to promote the retail sale of copies or phonorecords of the work, and the performance is not transmitted beyond the place where the establishment is located and is within the immediate area where the sale is occurring;

(8) performance of a nondramatic literary work, by or in the course of a transmission specifically designed for and primarily directed to blind or other handicapped persons who are unable to read normal printed material as a result of their handicap, or deaf or other handicapped persons who are unable to hear the aural signals accompanying a transmission of visual signals, if the performance is made without any purpose of direct or indirect commercial advantage and its transmission is made through the facilities of: (i) a governmental body; or (ii) a noncommercial educational broadcast station (as defined in section 397 of title 47); or (iii) a radio subcarrier authorization (as defined in 47 CFR 73.293-73.295 and 73.593-73.595); or (iv) a cable system (as defined in section 111(f)).

(9) performance on a single occasion of a dramatic literary work published at least ten years before the date of the performance, by or in the course of a transmission specifically designed for and primarily directed to blind or other handicapped persons who are unable to read normal printed material as a result of their handicap, if the performance is made without any purpose of direct or indirect commercial advantage and its transmission is made through the facilities of a radio subcarrier authorization referred to in clause (8)(iii), *Provided*, That the provisions of this clause shall not be applicable to more than one performance of the same work by the same performers or under the auspices of the same organization.

ASSOCIATION OF RADIO READING SERVICES

Officers:

President

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State Administrator
State Services for the Blind
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Vice President

Mr. Walter B. Boninger
Greater Cleveland Radio Reading Service
Executive Director
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Tel. (216) 791-8118

Secretary

Rev. Boniface L. Wittenbrink
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Radio Information Service for
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Treasurer

Dr. Margaret W. Rockwell
Director
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Executive Director
COORS
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Mr. Thomas C. Warnock
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Mr. Robert D. Watson
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RADIO READING SERVICES FOR THE BLIND
AND OTHER HANDICAPPED PERSONS, INC.

B Y - L A W S

ARTICLE I. Name

The name of the organization shall be RADIO READING SERVICES FOR THE BLIND AND OTHER HANDICAPPED PERSONS, INC. It shall be incorporated as a nonprofit organization.

ARTICLE II. Purpose

The purposes of this organization shall be: to encourage the establishment and operation of radio reading services for blind and other handicapped persons who cannot read normal print because of their handicaps; to share technical and program information for the mutual benefit of such radio reading services; to participate with National Public Radio, the Corporation for Public Broadcasting, and research, manufacturing, and commercial entities in policy, program, and technical development; and to do any other lawful thing which will assist such radio reading services in the distribution and dissemination of health, education, recreation, and other public or social service information.

ARTICLE III. Membership

3.1 Participating Members. Radio reading services which qualify in one or more of the four categories of services enumerated in Section 110(8) of Public Law 94-553, and which broadcast at least

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sixty-three (63) hours a week of programs specifically designed for and primarily directed to blind or other handicapped persons who are unable to read normal printed material because of their handicaps, shall be eligible for participating membership in this organization.

3.2 Voting Delegates. Each Participating Member in good standing shall be entitled to three Voting Delegates in the National Assembly, which shall be the highest governing body and the ultimate source of policy and authority for the organization. Each Voting Delegate from each Participating Member shall represent and be designated by and from one of three (3) constituent classes: (1) the management of the radio reading service, (2) the listeners, and (3) volunteer workers for the radio reading service. No more than one of the Voting Delegates for a Participating Member shall represent the same constituent class. Alternate Voting Delegates may be designated by and from the respective constituent classes, but voting rights may not be otherwise transferred or assigned, and proxy voting shall not be permitted. Each such constituent class for a Participating Member shall have the exclusive power to fill a vacancy created by any cause or to replace its representative delegate at any time. In any case in which listeners or volunteer workers of a radio reading service have not formed their own organization through which their respective Voting Delegates can be selected, the method or system of selection shall be in accordance with criteria and

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procedures established by the Executive Committee of this organization.

3.3 Membership Dues. Each Participating Member shall pay annual dues of . A Participating Member which has not paid its annual dues will be notified of its delinquency by registered mail. If the dues are not paid within ninety (90) days, the Participating Member will be suspended from membership.

3.4 Non-voting Associate or Sustaining Members. Any person, organization, or corporation which is interested in the purposes of this organization may be invited by the Executive Committee to be Associate or Sustaining Members and as such may participate as non-voting members in the activities of this organization. Such organizations and corporations shall designate their representatives for such participation. Annual dues of Associate or Sustaining Members shall be fixed by the Executive Committee of this organization.

ARTICLE IV. Officers

The officers of the organization shall consist of a President, a Vice-President, a Secretary, and a Treasurer chosen from the roster of Voting Delegates to the National Assembly. They shall be elected by simple majority vote of the National Assembly at its annual meeting and shall serve for terms of two years. An officer who ceases to be a Voting Delegate to the National Assembly shall be thereby disqualified

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from continuing to serve as an officer. A vacancy in an office shall be filled by the Executive Committee; a person elected to fill a vacancy shall serve for the unexpired portion of the term of the officer whose place he has been chosen to fill. All officers shall assume their duties immediately after election and shall perform the usual functions of their offices as prescribed by Robert's Rules of Order, Revised. The Treasurer shall be bonded.

ARTICLE V. Executive Committee

5.1 Powers. The Executive Committee shall be the governing body of this organization between meetings of the National Assembly, provided that it shall make no policy decision and take no official action in conflict with existing decisions or actions of the National Assembly.

5.2 Classes of Members of the Executive Committee. The Executive Committee shall consist of no more than seventeen (17) members, as follows: (a) the four (4) elected officers; (b) nine (9) Class A Executive Committee members who shall be chosen from the roster of Voting Delegates to the National Assembly; (c) two (2) Class B Executive Committee members who shall be representatives of organizations of and for the blind; and (d) two (2) Class C Executive Committee members who shall be representatives of the radio broadcast industry, research, manufacturing, or commercial entities.

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5.3 Terms, Election, Disqualification, Vacancies. The term of office for Class A, Class B, and Class C Executive Committee members shall be two years. Class A Executive Committee members shall be chosen by simple majority vote of the National Assembly at its annual meeting. Class B and Class C members of the Executive Committee shall be chosen by simple majority vote of the four elected officers and the nine Class A members of the Executive Committee at the meeting of the Executive Committee immediately following the annual meeting of the National Assembly. A Class A Executive Committee member who ceases to be a Voting Delegate to the National Assembly shall be thereby disqualified from continuing to serve on the Executive Committee. A vacancy on the Executive Committee shall be filled by the Executive Committee; a person elected to fill a vacancy shall serve for the unexpired portion of the term of the Executive Committee member whose place he has been chosen to fill. All Executive Committee members shall assume their duties immediately after election.

ARTICLE VI. Other Committees

The President shall be authorized to appoint standing committees, subject to approval of the Executive Committee, and ad hoc committees as deemed necessary to further the purpose of this organization.

ARTICLE VII. Compensation

No officer, member of the Executive Committee, or member of any other committees of this organization shall receive any salary, fee, or other emolument except for actual expenses incurred in connection with meetings

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or other business of the organization.

ARTICLE VIII. Meetings of National Assembly

8.1 Annual Meetings. The National Assembly of this organization, which shall be composed of Voting Delegates from the Participating Members, shall hold an annual meeting for the election of officers and Class A Executive Committee members, for the consideration of annual reports, and for the transaction of other business of the organization.

8.2 Special Meetings. Special meetings of the National Assembly may be called at any time by the Executive Committee of its own accord and shall be called upon the request of twenty-five percent (25%) of the full membership of the National Assembly at the time of the request. The specific purpose of a special meeting shall be specified in the call for the meeting, and no other business may be transacted at such special meeting.

8.3 Time, Place, and Notice of Meetings. Annual and special meetings shall be determined by the Executive Committee. The time of each annual meeting shall be determined by the Executive Committee. The time of a special meeting called by the Executive Committee shall be determined by the Executive Committee. The time of a special meeting called by request of twenty-five percent of the membership shall be set by those persons making the request. The Executive Committee shall be responsible for sending written notices of both annual and special meetings to all Participating Members not less than thirty (30) days before the dates of

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such meetings. Each meeting notice shall state the place, day, and hour of the meeting. The notice of a special meeting shall, in addition, state the purpose or purposes for which the meeting is called.

8.4 Quorum and Chairmanship. A majority of the Voting Delegates shall constitute a quorum for the transaction of all business at any regular or special meeting of the National Assembly, but any lesser number may adjourn any meeting from time to time until a quorum is present. The President or, in his absence, the Vice-President, shall preside over each business session of the National Assembly.

8.5 Voting and Proxies. Each Voting Delegate shall be entitled to one vote at any meeting of the National Assembly. Proxy voting shall not be allowed at any such meeting.

8.6 Participation in Meetings. Only Voting Delegates from Participating Members shall be entitled to vote at a meeting of the National Assembly.

ARTICLE IX. Meetings of Executive Committee

9.1 Regular Meetings. Regular meetings of the Executive Committee shall be held immediately after each annual meeting of the National Assembly and at such other times as the Executive Committee may decide.

9.2 Special Meetings. Special meetings may be called by the President or by seven or more members of the Executive Committee.

9.3 Time, Place, and Notice of Meetings. Meetings shall be held at such

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location or locations as shall be determined by the Executive Committee. The time of each regular meeting shall be determined by the Executive Committee. The time of a special meeting called by the President shall be determined by the President. The time of a special meeting called by other members of the Executive Committee shall be determined by those calling the meeting. The President shall be responsible for sending written notices of both regular and special meetings to all members of the Executive Committee not less than fifteen (15) days before the dates of such meetings. A meeting notice shall state the place, day, and hour of the meeting.

9.4 Quorum and Chairmanship. A majority of the members of the Executive Committee shall constitute a quorum for the transaction of all business at any regular or special meeting of the Executive Committee. The President or, in his absence, the Vice-President, shall preside over each meeting of the Executive Committee.

9.5 Voting and Proxies. Each member of the Executive Committee shall be entitled to one vote at any meeting of the Executive Committee. Proxy voting shall not be allowed.

9.6 Participation in Meetings. Only members of the Executive Committee shall be entitled to participate in the transaction of business at a meeting of the Executive Committee.

ARTICLE X. Procedure

In the absence of provisions contained herein, all proceedings of this

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organization shall be governed by Robert's Rules of Order, Revised.

ARTICLE XI. Amendment

These by-laws may be altered, amended, or repealed, and new by-laws may be adopted, by the affirmative vote of two-thirds or more of the Voting Delegates at an annual meeting of the National Assembly.

ARTICLE XII. Dissolution

In the event of dissolution any remaining assets of this organization shall be distributed to one or more nonprofit organizations to be used for purposes consistent with the purposes and objectives of this organization.

THE END

REPORT AND RECOMMENDATION OF
THE BY-LAWS COMMITTEE OF
THE THIRD NATIONAL CONFERENCE
OF RADIO READING SERVICES FOR
THE BLIND AND PHYSICALLY HANDICAPPED
March 15, 1977

By-Laws Committee Members

Durward K. McDaniel, Chairman

B. L. Wittenbrink

C. Stanley Potter

Travis L. Harris

The attached by-laws are recommended for adoption by this committee. At an appropriate time, a motion will be made to adopt these by-laws in their present or amended form and to elect temporary officers and temporary Class A members of the Executive Committee to serve in those capacities and to have all of the powers and responsibilities described in such by-laws until their successors are elected for regular terms by the first annual meeting of the National Assembly.

Note that Article III, Section 1 refers to four categories of services enumerated in Section 110(8) of Public Law 94-553. Because that reference affects eligibility for participating membership, the relevant portion of clause 8 is quoted as follows:

"if the performance is made without any purpose of direct or indirect commercial advantage and its transmission is made through the facilities of: (i) a governmental body; or (ii) a noncommercial educational broadcast station (as defined in section 397 of title 47); or (iii) a radio subcarrier authorization (as defined in 47 CFR 73.293-73.295 and 73.593-73.595); or (iv) a cable system (as defined in section 111(f))."

AMENDMENTS TO THE BY-LAWS MADE AT THE 3RD NATIONAL RADIO
READING SERVICE CONFERENCE, BETHESDA, MARYLAND, March 14-17,
1977.

ARTICLE I. NAME

Amended to read: The name of the organization shall be
ASSOCIATION OF RADIO READING SERVICES.

A motion was made to change the word NATIONAL (Assembly)
to GENERAL (Assembly) wherever it appears in the by-laws.

ARTICLE IV. OFFICERS

Amended to read: A person elected to fill a vacancy shall
serve until the meeting of the next
General Assembly.

